

Act 64/RCRA Inspection Report

13th  
ACT 64/RCRA INSPECTION REPORT

No Land Ban Yet

I.D. Number (U.S. EPA or Michigan) MID 9805687LL

FACILITY NAME

Ford Motor Co Allen Park Clay Mine

Mailing Address

15201 Century Dr. (17005 Oakwood Blvd.)

Dearborn (Allen Park) Michigan 48120  
City Zip Code

DATE

3-29-94

TIME (from)

~1:00 PM

(to)

~3 PM

PERSON(S) INTERVIEWED

TITLE

TELEPHONE #

David A. Knutson

Site Manager Trainee

(313) 390-3209

INSPECTOR(S)

AGENCY

TELEPHONE #

Chris Silva

MDVR-WARD

(313) 953-1457

Jim Frost

" "

" "

Primary Business of this Facility: A Landfill that is:  
Now accepting non-haz FMC wastes;  
License up for renewal and possible amendment to accept both FMC  
and non-FMC haz. wastes.

Do you discharge a process wastewater to the local POTW, that would otherwise be a RCRA regulated hazardous waste? ☒ yes ☐ no

Reason for Inspection:

Leachate from old haz. and non haz. cells; rainwater runoff from  
new and old cells; Leachate from new nonhaz cell; Truck wash  
Complaint rinsewater

☒ Routine

☐ Follow-up



# Act 64/RCRA Inspection Report

FORM

Based upon the inspection, this facility:

☐ does not generate any hazardous waste  
☐ conditionally exempt small quantity generator E  
☐ small quantity generator inspection form - - - - - -A  
☐ generator inspection form B  
☐ generator tank(s) system inspection form - - - - - -B1  
☐ transporter inspection form C  
☐ boilers and industrial furnaces - - - - - F

## PERMITTED TSDF

☒ treatment/storage/disposal facility (Subpart A-E & I) - - - - -D  
☐ generator appendix inspection form D1  
☐ TSDF tank system inspection form (Subpart J) - - - - -D2  
☐ surface impoundments inspection form (Subpart K) D3  
☐ waste piles inspection form (Subpart L) - - - - -D4  
☐ land treatment inspection form (Subpart M) D5  
☒ landfill inspection form (Subpart N) - - - - -D6  
☐ incineration inspection form (Subpart O) D7  
☐ miscellaneous units inspection form (Subpart X) - - - - -D8

## INTERIM STATUS TSDF

☐ treatment/storage/disposal facility (Subpart A-E & I) - - - - -D9  
☐ generator appendix inspection form D1  
☐ groundwater monitoring (Subpart F) use w/ Subparts K,L,M&N D10  
☐ TSDF tank system inspection form (Subpart J) - - - - -D2  
☐ surface impoundments inspection form (Subpart K) D11  
☐ waste piles inspection form (Subpart L) - - - - -D12  
☐ land treatment inspection form (Subpart M) D13  
☐ landfills inspection form (Subpart N) - - - - -D14  
☐ incineration & thermal treatment inspection form (Subpart O&P) D15  
☐ chemical, physical & biological treatment form (Subpart Q) - - -D16

COMMENTS:

*Facility is IC*



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

- d) Containers holding free liquids, including lab packs. ☐ ☐
- e) Waste which will do the following:
- (I) Adversely effect the permeability of the clay liners. ☐ ☐
  - (II) Produce a leakage incompatible with the synthetic liner and leachate collection system, discharge piping and off-site sewer system. ☐ ☐
  - (III) Generate gases which will adversely effect the permeability of the clay cap. ☐ ☐
  - (IV) Create a violation of the 1975 PA 348 (clean air act) and rules promulgated there under. ☐ ☐
- f) Waste which are banned from landfilling unless a variance is obtained from this ban from the regional administrator of EPA. ☐ ☐

3. If Land Ban waste, has FMC submitted a revised Waste Analysis Plan to the Chief of the Waste Management Division (WMD) which describes the procedure to be used to ensure that these waste are not landfilled. NA

Y ☐ N ☐

**Note:** The plan should be submitted for approval 60 days prior to the effective date of such rules. If the effective date is less than 60 days from the promulgated date, the licensee should submit the revised plan no more than 60 days upon which such rules are finalized.

4. Are all waste coming and being accepted placed in a closed container or otherwise totally contained or covered during transportation. NA

Y ☐ N ☐

**C. Landfill Construction and Design Specifications**  
The licensee shall do the following prior to constructing cell 2.

YES NO

- a) Did FMC verify that the natural clay base consist of not less than six meter of soil with a maximum permeability of  $1.0 \times 10^{-6}$  (0.000006) cm/sec, or equivalent base approved by Chief of WMD as required under R299.9603. ✓

2

2/18/92

YES NO

Date: 3-29-94

- b) Did FMC submit documentation for approval by the Chief of the WMD within 60 days of the effective date of this license that section V of the construction quality assurance plan (attachment) was followed during removal of the water from the bottom of the cell 2 to prevent basal heave. If the quality assurance plan is not followed, the FMC will be required to furnish some more



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

information that the natural clay meets the requirement of Act 64. ✓

c) Did FMC submit a plan for approval, by the chief of the WMD, within 60 days of the issuance of the license to construct and evaluate a test fill which demonstrates that the proposed design can be constructed in accordance with the approved plans and specification, (attachment 7) and will perform in accordance with the basis of design. ✓

d) Has FMC submitted the result of the test fill evaluation and received approval by the Chief of WMD, that the test fill evaluation required in C.I.C. has demonstrated that constructibility and performance of cell 2. ✓

e) Has FMC submitted a plan for approval, by the Chief of the WMD, within 60 days of issuance of this license for obtaining additional soil shear strength detail below and lateral, to cell 2 and re-evaluation of the stability of the design slopes. ✓

f) Has FMC submitted the data and slope stability evaluation and received approval from the chief of the chief of WMD, that sufficient data has been obtained and the evaluation demonstrates an adequate degree of stability for the design slopes. ✓

i. If this evaluation does not demonstrate an acceptable factor of safety, has FMC revised engineering plans and design specification submitted which reflects a new design of the slopes. NA

2. For cell 2, has FMC designed, constructed, operated and maintained a liner system which complies with R. 299.9619

Y ✓ N

**Does the liner include:**

a) A leachate collection and removal system to collect and remove leachate from the landfill. Y ✓ N

3

2/18/92

Date: 3-29-94

b) A composite primary liner which consist of the following:

i) A top component consisting of HDPE synthetic liner which is minimum of 80 mils thick that prevents waste



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

from passing into the liner during active life of the facility. Y ☒ N

- ii) A broken component consisting of compacted clay which is minimum of 150 centimeters thick. Y ☒ N

- c) A leachate detection and collection and removal system. Y ☒ N

- d) A secondary liner consisting of HDPE synthetic liner which is a minimum of 60 mills thick. Y ☒ N

3. Is the liner required in condition C.2:

- a) Designed and installed in accordance with the specification included in attachment 9 and based on requirement detailed in Michigan Act 64, Rule 299.9621(1)(c) and 299.9620(2). Y ☒ N

- b) Sloped not less than 2% at any point and drain to leachate collection (or leak detection) liners or sumps. Y ☒ N

4. Has FMC submitted a program for demonstrating compatibility of leachate with the specified synthetic liner and all other construction material to be used within 21 days of the effective date of this license. Y ☒ N

- i. Was the approved compatibility testing program conducted and the result evaluated with respect to the basis of the design requirements. Y ☒ N

5. Has FMC designed, constructed, operated and maintained a leachate collection and removal system to collect and remove leachate from the landfill. Y ☒ N

- a) For cell 1, has FMC assured all of the following: YES NO

- i) That the leachate collection system is maintained, inspected, and operated to maintain a leachate head on the liner of 12 inches or less. YES ☒ NO

4 Manually pumped out on daily basis

2/18/92

Date: 3-29-94

YES NO

- ii) That the flow volume is continuously recorded. YES ☒ NO

- b) For cell 2, has FMC assured all of the following:

- i) That leachate collection system for the cell possess a hydraulic conductivity of  $1 \times 10^{-10}$  to



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

Yes No

power -2 cm/sec and a transmissivity of at least 3 X 10 to power -1 cm squared per second and are composed of that drainage media specified in attachment 9 or other media approved by the director.

✓     

ii) That the leachate collection system include a system for collecting and draining leachate from the side walls of each cell.

✓     

iii) That leachate system is maintained, inspected, and operated to maintain a leachate head on the primary liner of 12 inches or less.

     NA  
*Not yet in operation  
Rainwater is pumped into  
Detroit Sewer System*

iv) That the leachate collection sumps have a volume not less than 4000 liters and are accessible for removal of leachate and as necessary for maintenance of the leachate removal system. The sumps shall be constructed of material compatible with the leachate formed in the landfill.

✓     

v) The daily cover and waste placement in the cell are done in such a manner that the flow of leachate in the collection system to the sump is not prevented.

NA     

vi) That flow volume removal are continuously recorded.

NA     

c) For cell 2, are leachate removal and collection constructed according to attachment 7 and the specification contained in attachment 9.

✓     

6. Has FMC design, constructed and operated a leak detection, collection and removal system beneath the primary liner of all cells.

✓     

-Is the system capable of detecting and removing any migrating liquid through the cells, including sidewalls and including the volume and quantity of such liquids.

Date: 3-29-94 5

2/18/92  
YES NO

-Does the drainage media of the leak detection, collection and removal system meet those specifications outlined in attachment 9 of this license or other specification approved by the Chief of WMD.

✓     

7. FILL IN\*\*\*\*\*



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FORD ALLEN PARK CLAY MINE

Run-on, Runoff, And Contaminant Control.

- Did the licensee -
- Construct, operate and maintain a run-on control system capable of preventing flow to the active portion of the facility during peak discharge from at least a 24 hour, 25 year storm. NA  
Y \_\_\_\_\_ N \_\_\_\_\_
- Divert runoff from non-active portions of the site to drainage ditches as specified on the engineering plans (Attach. 7)  
Y ☒ N \_\_\_\_\_
- Collect and control the water volume resulting from active section of the facility from at least a 24 hour, 100 year storm. **Note:** This runoff shall be discharged in accordance with the Federal Clean Water Act and 1929 PA 245.  
Y ☒ N \_\_\_\_\_

Does the licensee require:

- That all waste delivery truck traffic within the active cell be on a pavement or clean daily-cover to ensure that the contaminant are not carried out of the cell to the haul road. NA w/ Reference to Haz. waste cell  
For Non-Haz. Cell Y ☒ N \_\_\_\_\_
- Does the licensee operate and maintain a vehicle wash facility?  
Y ☒ N \_\_\_\_\_
- If yes...  
Does the licensee ensure that vehicles traveling on active portion of the site are cleaned and decontaminated at the facility before leaving the activity area.  
Y ☒ N \_\_\_\_\_

Date: 3-29-94

6

2/18/92

Waste Placement

Does the licensee:

- Only place waste in the portion of cell 2 for which certification has been approved by a registered professional engineer. NA  
Y \_\_\_\_\_ N \_\_\_\_\_



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

- Assure that the containers are at least 90% full when placed in a landfill, or crushed, shredded or simply reduced in volume to the maximum practical extent before burial in a landfill. If crushed in a landfill site, containers shall be crushed only in a landfill cell which is fully certified by a registered professional engineer.

Y \_\_\_\_\_ N NA

- Record the contents, quantity, and location of each daily waste deposit in the operating log. NOTE: This information shall be recorded on a map or diagram of each cell of disposal area and shall include cross reference to specific manifest document numbers.

Y ✓ N \_\_\_\_\_

F. Environment And Human Health Standards

Does FMC operate the facility in a manner that will prevent all of the following:

- Danger to human health, welfare or the environment.

Y ✓ N \_\_\_\_\_

- Violation of the Federal Clean Water Act as amended and Michigan Water Resource Commission Act.

Y ✓ N \_\_\_\_\_

- Air emission in violation of Federal Clean Air Act, as amended, the Michigan Air Pollution Act.

Y ✓ N \_\_\_\_\_

- Exposure of humans or the environment to harmful quantity of hazardous waste or hazardous waste constituents.

Y ✓ N \_\_\_\_\_

- Pollution, impairment or destruction of the natural resources of the state.

Date: 3-29-94

7

2/18/92

- Does the licensee place at least 15 cms of clean soil or other material approved by the Chief of Waste Management Division over the waste at the end of each working day.

Y \_\_\_\_\_ N \_\_\_\_\_

*NA for  
Now the cell  
at present time*

Does FMC effectively:

- Control Fugitive dust emission, in the manner approved by



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

the Chief of Waste Management Division.

For NonHaz.  
Cell

for haz.  
NA ~~Cell~~  
Cell that is not  
operating at present  
Time.

Y ☒ N

- Control all paved roads and make sure they are cleaned at least once during the days operation by a mechanical vacuum sweeper or other means approved by the Chief of Waste Management Division.

Y ☒ N

- Does FMC operate the vehicle wash facility at the landfill in such a way that aerosol sprays and other atmospheric emissions generated therefor do not result in a violation of the 1965 P.A. 348 as amended.

Y ☒ N

- Does FMC operate all vehicles in a manner which minimizes the contamination of on-site haul roads.

Y ☒ N

NA for haz  
waste at  
present  
Time

- How does the facility handle the sludge from the wheel wash sump?

Recycle and Reclaim ~~water~~ - No haz. Waste  
is being generated yet.

Note: The sludge should be handled as listed hazardous waste for those waste types accepted at the facility. -- Generator requirements.

- Does FMC maintain an inspection log for all vehicles leaving the facility for the past six months.

Y ☒ N

does this for  
non haz waste  
at present

- Do these records indicate that there is any visible waste in the cargo section of any vehicle leaving the facility.

Y N ☒

2/18/92

Date: 3-29-94

8

Note: If there is waste in the cargo the facility should take all steps necessary to assure that all waste is removed from the vehicle prior to leaving the facility.

G. Partial Closure

YES NO

1. Close the landfill in accordance with plan 13/ of attach-

NA



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

7,5, & schedule. and specification of attachment 9. NA

2. Is there an established shallow rooted grasses or is there a plan to start one in the earliest possible time to maintain the vegetation so as to stabilize the cap and prevent erosion NA

3. Has FMC submitted, to the director, a detailed partial closure plan consistent with the license for each portion of Cell 2 at least 180 days before the expected date of partial closure. NA

What is the expected date of closure 8-10 years

H. Final Closure

1. FMC shall complete final closure in accordance with the schedule, engineering plans, and specifications of attachments 5,7, & 9.

FEDERAL PERMIT CONDITIONS

Are waste minimization certifications maintained as part of the operating log? (264.73(b)(9) (I. Standard Condition G.5.)

Yes \_\_\_\_\_ No NA

Haz. waste cell isn't operating yet.

Does the permittee certify at least annually that they have a program in-place to reduce the volume and toxicity of hazardous waste generated as specified in I. Standard Condition H.

Yes \_\_\_\_\_ No \_\_\_\_\_

NA

Date: 3-29-94

9

2/18/92

Does the Permittee comply with all the applicable land disposal prohibitions of 40 CFR 268? (II. Land Disposal Restrictions)

Yes \_\_\_\_\_ No \_\_\_\_\_ N/A ✓



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

Discuss corrective action status with the appropriate US EPA Permit Engineer assigned to the facility. (Rich Traub, US EPA Permit Unit Supervisor (312) 886-6136. He is the contact for determining appropriate Engineer assigned.)

USEPA Permit Engineer: \_\_\_\_\_

Status Update from USEPA: \_\_\_\_\_

Inspection results: *Facility is I.C. Not yet operating New Haz. Waste Cell #2*



PERMITTED LANDFILL INSPECTION FORM

Facility's Name FMC Allen Park Clay Mine

INSPECTION FORM D6  
Part 6 Rules  
P.A. 64 of 1979

Date 3-29-94 I.D. # MID 980568711

Rule 619 refers to 40 CFR, Part 264, Subpart N, 264.300-264.351

Violation			
Class	Yes	No	N/A

DESIGN AND OPERATING REQUIREMENTS (264.301)

1) Any landfill (except a new landfill, new unit, replacement, or lateral expansion at an existing landfill) must have:

a) A liner which is constructed and installed to prevent migration of waste. The liner must be:

i) Constructed of materials that have appropriate chemical properties, sufficient strength and thickness. (264.301(a)(1)(i))

(I) ☒ ☐ ☐

ii) Placed on a foundation or base capable of providing support and resistance to pressure gradients. (264.301(a)(1)(ii))

(I) ☒ ☐ ☐

iii) Installed to cover all surrounding earth likely to be in contact with waste or leachate. (264.301(a)(1)(iii))

(I) ☒ ☐ ☐

b) A leachate collection and removal system immediately above the liner. (264.301(b))

(I) ☒ ☐ ☐

OR

2) Received an exemption from the existing liner requirements from the Director. (264.301(b))

(I) ☐ ☐ ☒

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



Landfill Inspection Form  
Form D6

	Violation Class	Yes	No	N/A
3) The owner/operator of a new landfill, new unit, replacement, or lateral expansion at an existing landfill must have:				
a) Met the requirements of R 299.9620(2). (Rule 619(2))	(N/A)	<input checked="" type="checkbox"/>	___	___
b) Two or more liners. (264.301(c))	(I)	<input checked="" type="checkbox"/>	___	___
c) Leachate collection system above and between liners. (264.301(c))	(I)	<input checked="" type="checkbox"/>	___	___
OR				
d) Approval for alternate design from Director. (264.301(d & e))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>
4) Operates and maintains a leak detection, collection and removal system between the liners as per R 299.9622. (Rule 619(3))	(N/A)	<input checked="" type="checkbox"/>	___	___
5) The owner/operator must operate and maintain a run-on control system to stop flow onto active portion (minimum 25-year storm). (264.301(f))	(I)	<input checked="" type="checkbox"/>	___	___
6) The owner/operator must operate and maintain a run-off system to collect and control water (minimum 25-year storm). (264.301(g))	(I)	<input checked="" type="checkbox"/>	___	___
7) Were collection and holding units (ex: tanks) for run-on and run-off emptied or other wise managed right after a storm. (264.301(h))	(I)	<input checked="" type="checkbox"/>	___	___
8) If landfill is subject to wind disposal is it covered or controlled to stop wind dispersal. (264.301(i))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_

MONITORING AND INSPECTIONS (264.303)

9) During installation were liners and cover systems inspected (ex: uniformity, damage, etc.) (264.303(a))	(I)	<input checked="" type="checkbox"/>	___	___
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Landfill Inspection Form  
Form D6

		Violation Class	Yes	No	N/A
10)	Immediately after construction or installation of liner(s) or cover system(s) were:				
a)	Synthetic cover and liners inspected to ensure:				
i)	Tight seams and joints. (264.303(a)(1))	(I)	<input checked="" type="checkbox"/>	___	___
ii)	Absence of tears, punctures or blisters. (264.303(a)(1))	(I)	<input checked="" type="checkbox"/>	___	___
b)	Soil-based and admixed liner and covers inspected for imperfections (ex: lenses, cracks, root holes, etc.) (264.303(a)(2))	(I)	<input checked="" type="checkbox"/>	___	___
11)	While a landfill is in operation, was it inspected weekly and after storms for: <i>Not yet in operation</i>				
a)	Deterioration, malfunction or improper operation of run-on and run-off control systems. (264.303(b)(1))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>
b)	Proper functioning of wind dispersal system. (264.303(b)(2))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>
c)	Presence of leachate in and proper functioning of leachate collection and removal system. (264.303(b)(3))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>
<b><u>SURVEYING AND RECORDKEEPING (264.309)</u></b>					
12)	Does the owner/operator maintain the following in the operating record: <i>Not yet in operation but map is on site</i>				
a)	A map of each cell (location & dimension). (264.309(a))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>
b)	Contents of cell and location of each waste type. (264.309(b))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



Landfill Inspection Form  
Form D6

Violation			
Class	Yes	No	N/A

SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE (264.312)

13) Ignitable or reactive waste must not be placed in a landfill unless:

a) The waste is treated, etc. before or after placement in the landfill so:

i) The waste/mixture is no longer ignitable or reactive. (264.312(a)(1))

(I) [ ]      ✓

ii) Taken precautions to prevent reactions which generate extreme heat, fire, gases, damage the facility, or other like means that threatens human health & environment. (264.312(a)(2) refers to 264.17(b))

(I) [ ]      ✓

EXCEPT

b) Ignitable waste in containers is protected for conditions/material which may cause it to ignite or react can be landfilled. (264.312(b))

(I) [ ]      ✓

SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES (264.313)

14) Incompatible wastes must not be placed in the same landfill cell unless 264.17(b) is complied with. (264.313)

(I) [ ]      ✓

DISPOSAL OF SMALL CONTAINERS OF HAZARDOUS WASTE IN OVERPACKED DRUMS (LAB PACKS) (264.316)

15) Small containers in overpack drums may be landfilled if:

a) Containers are:

i) Non-leaking. (264.316(a))

(I) [ ]      ✓

ii) Won't react, ignite or dangerously decompose with other container waste. (264.316(a))

(I) [ ]      ✓

iii) Container uses meets DOT and is sealed. (264.316(a))

(I) [ ]      ✓



Landfill Inspection Form  
Form D6

	Violation Class	Yes	No	N/A
b) Overpack is:				
i) Meets DOT. (264.316(b))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Maximum 110 gallons. (264.316(b))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Sufficient absorbent used that will not react, ignite or dangerously decompose with waste. (264.316(b&c))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16) Were incompatible wastes placed in same container. (264.316(d))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17) Were reactive wastes (other than cyanide or sulfide bearing) treated. (264.316(e))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SPECIAL REQUIREMENTS FOR HAZARDOUS WASTES F020, F021, F022, F023, F026 AND F027. (264.317)

18) Were F020, F021, F022, F023, F026 and F027 placed in a landfill without an approved plan from the Director. (264.317(a))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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CLOSURE AND POST-CLOSURE CARE (264.310)

19) Did the owner/operator close the landfill in compliance with 264.310 and R 299.619(5).	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Comments: \_\_\_\_\_

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PERMITTED TREATMENT/STORAGE/DISPOSAL FACILITY  
INSPECTION FORM

Facility's Name FMC Allen Park Clay Mine  
 Date 3-29-94 I.D. # MID 980568711

INSPECTION FORM D  
 Part 6 Rules  
 P.A. 64 of 1979

his facility, in addition being a treatment, storage &/or disposal facility:  
☐ Generates Hazardous Waste (also use Form D1) — *will do so in the future from its*  
☐ Transports Hazardous Waste (also use Form C) *Truck wash.*

his facility:

☒ Accepts waste from off-site sources  
☐ Handles only its own waste

If applicable, hazardous waste is stored in:

☐ Container(s) (drums, totes, roll-off boxes, etc)  
☐ Tank(s) (also use Form D2)  
☐ Waste pile(s) (also use Form D4)  
☐ Surface Impoundment(s) (also use Form D3)  
☐ Miscellaneous Unit(s) (also use Form D8)

Number of units

If applicable, hazardous wastes are treated in:

☐ Surface Impoundment(s) (also use Form D3)  
☐ Waste pile(s) (also use Form D4)  
☐ Land treatment (also use Form D5)  
☐ Incinerator (also use Form D7)  
☐ Aboveground tank(s) (also use Form D2)  
☐ Underground tank(s) (also use Form D2)  
☐ Container(s)  
☐ Miscellaneous Unit(s) (also use Form D8)

If applicable, hazardous waste are disposed in:

☐ Surface Impoundment(s) (also use Form D3)  
☐ Land treatment (also use Form D5)  
☒ Landfill (also use Form D6)  
☐ Incinerator (also use Form D7)  
☐ Miscellaneous Unit(s) (also use Form D8)

WASTE STREAM(S)

<u>HAZARDOUS WASTE #</u> <u>CODE/NAME</u>	<u>SOURCE</u>	<u>TYPE OF</u> <u>STORAGE</u>	<u>HOW MUCH/</u> <u>TIME PERIOD</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____



Treatment/Storage/Disposal Facility  
Form D

HAZARDOUS WASTE # CODE/NAME	SOURCE	TYPE OF STORAGE	HOW MUCH/ TIME PERIOD

LAND BAN WASTE YES ☒ NO ☐

Comments: Liner is completed but operation of haz. cell has not commenced.  
Facility has apparently submitted new license application to accept other than  
FMC haz waste. This effectually starts the whole permitting process over  
again



Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
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ENVIRONMENTAL AND HUMAN HEALTH STANDARDS GENERALLY (Rule 602)

1. Is the TSDF operated in a manner that will prevent the following:

- |  |       |     |     |                                     |
|--|-------|-----|-----|-------------------------------------|
| a) Violations of Federal Clean Water Act or Act 245. (Rule 602(1)(a))  | (N/A) | [ ] | ___ | <input checked="" type="checkbox"/> |
| b) Air emissions in violation of the Federal Clean Air Act or Act 348. (Rule 602(1)(b))                          | (N/A) | [ ] | ___ | <input checked="" type="checkbox"/> |
| c) Degradation, as defined in act 245, of a sole-source aquifer. (Rule 602(1)(c))                                | (N/A) | [ ] | ___ | <input checked="" type="checkbox"/> |
| d) Exposure of humans or the environment to harmful quantities of hazardous waste/constituents. (Rule 602(1)(d)) | (N/A) | [ ] | ___ | <input checked="" type="checkbox"/> |
| e) Pollution, impairment or destruction of natural resources of the state. (Rule 602(1)(e))                      | (N/A) | [ ] | ___ | <input checked="" type="checkbox"/> |

FACILITY DESIGN AND OPERATING STANDARDS (Rule 604)

2. If applicable, are the following maintained at the TSDF:

- |  |       |                                     |     |     |
|--|-------|-------------------------------------|-----|-----|
| a) A run-on control system for a 24-hour, 25-year storm. (Rule 604(1)(a))          | (N/A) | <input checked="" type="checkbox"/> | ___ | ___ |
| b) A run-off management system for a 24-hour, 100-year storm. (Rule 604(1)(b))     | (N/A) | <input checked="" type="checkbox"/> | ___ | ___ |
| c) Systems to prevent hazardous waste/constituents from escaping. (Rule 604(1)(c)) | (N/A) | <input checked="" type="checkbox"/> | ___ | ___ |

Rule 605 refers to 40 CFR 264, Subpart B, 264.10-264.18

GENERAL FACILITY STANDARDS (264.11 & 264.12)

- |  |      |                                     |     |                                     |
|--|------|-------------------------------------|-----|-------------------------------------|
| 3. Does the facility have an EPA id #. (264.11)  | (1)  | <input checked="" type="checkbox"/> | ___ | ___                                 |
| 4. If required, have the following been notified:  |      |                                     |     |                                     |
| a) Director of receipt of hazardous waste from a foreign source. (264.12(a))   | (11) | [ ]                                 | ___ | <input checked="" type="checkbox"/> |
| b) The generator that the TSDF has permit(s) for and will accept the generators waste (copy of letters in operating record). (264.12(b)) | (11) | [ ]                                 | ___ | <input checked="" type="checkbox"/> |



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
c) Director on change in owner/operator. (264.12(c))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

GENERAL WASTE ANALYSIS (264.13)

5. Has the owner/operator obtained a detailed chemical and physical analysis of the waste. (264.13(a)(1))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. If necessary, has analysis been repeated to ensure it accurate. (264.13(a)(3))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. If necessary, is waste received from off-site inspected/analyzed to determine if it matches the manifest. (264.13(a)(4))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Does the owner/operator have a detailed waste analysis plan on file at the facility,	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the plan include:				
a) The parameters to analyze waste. (264.13(b)(1))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Test and sampling methods. (264.13(b)(2&3))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Frequency initial analysis will be reviewed or repeated. (264.13(b)(4))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Off-site waste analysis from generator and any additional analysis required. (264.13(b)(5&6))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For surface impoundments, exempt from land disposal restrictions under 268.4(a), the following schedule and procedures:				
i) Sampling of impoundments. (264.13(b)(7)(i))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Analysis of test data and annual removal of residues. (264.13(b)(7)(ii&iii)(A)(B)(1-2))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Does the waste analysis plan specify procedures for inspection and analysis of each off-site waste to ensure that it matches the manifest. (264.13(c))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: \_\_\_\_\_



Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
--------------------	-----	----	-----

SECURITY (264.14)

10. Is unknowing entry prevented into active portion (unless demonstrated to Director the physical contact and disturbance will not cause a violation), by:

a) 24-hour surveillance. (264.14(b)(1))

(I) [ ]

\_\_\_

✓

OR

b) Artificial or natural barrier and controlled entry. (264.14(b)(2)(i&ii))

(I) [✓]

\_\_\_

\_\_\_

c) Danger sign(s) at entrance. (264.14(c))

(I) [✓]

\_\_\_

\_\_\_

GENERAL INSPECTION REQUIREMENTS (264.15)

11. Does the owner/operator inspect the facility for malfunctions, deterioration, operator errors and discharges of hazardous waste that may effect human health or the environment. (264.15(a))

(II) [✓]

\_\_\_

\_\_\_

12. Does the owner/operator have a written inspection schedule kept at the facility with the following: (264.15(b)(1&2))

a) Monitoring equipment. (264.15(b)(1))

(II) [✓]

\_\_\_

\_\_\_

b) Safety & emergency equipment. (264.15(b)(1))

(II) [✓]

\_\_\_

\_\_\_

c) Security devices. (264.15(b)(1))

(II) [✓]

\_\_\_

\_\_\_

d) Operating and structural equipment (i.e.: dikes, pumps, etc.) 264.15(b)(1))

(II) [✓]

\_\_\_

\_\_\_

e) Types of problems to be looked for (i.e.: leaky fittings, eroding dike, etc.) (264.15(b)(3))

(II) [✓]

\_\_\_

\_\_\_

f) Inspection frequency based on: (264.15(b)(4))

(II) [✓]

\_\_\_

\_\_\_

i) Possible deterioration rate of equipment. (II)

[✓]

\_\_\_

\_\_\_

ii) Areas subject to spills daily. (II)

[✓]

\_\_\_

\_\_\_

13. Does the owner/operator keep a record of inspections in an inspection log at the facility that contains the following: (264.15(b)(2) & (d))

i) Date and time of inspection. (II)

[✓]

\_\_\_

\_\_\_



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
ii) Name of the inspector.	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Notation of observations made.	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Date and nature of repairs or other remedial actions.	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Were malfunctions/deterioration of equipment or structures remedied on a schedule which ensures that the problem does not lead to an environmental or human health hazard. And where a hazard is imminent or already occurred remedial action is taken immediately. (264.15(c))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Old Haz. Landfill on site may be leaking and is being monitored.  
Liquid in discharge line containment system is sampled

PERSONNEL TRAINING (264.16)

15. Do personnel training records contain the following:

a) Job title? (264.16(d)(1))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Job descriptions? (264.16(d)(2))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Name of employee filling jobs? (264.16(d)(1))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Description of type & amount of both introductory and continued training? (264.16(d)(3))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Is training designed to ensure that facility personnel are able to respond effectively to emergencies? (264.16(a)(3))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Records of training? (264.16(d)(4))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Do new personnel receive required training within 6 months? (264.16(b))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Do personnel training records indicate that personnel have taken part in an annual review of initial training? (264.16(c))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: \_\_\_\_\_



Treatment/Storage/Disposal Facility  
Form D

Violation			
Class	Yes	No	N/A

GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTE (264.17)

16. If required, are the following taken:

- |   |     |                          |   |                                     |
|---|-----|--------------------------|---|-------------------------------------|
| a) Ignitable/reactive waste separated and protected from ignition sources with 'No smoking' signs. (264.17(a))  | (I) | <input type="checkbox"/> | — | <input checked="" type="checkbox"/> |
| b) Precautions to prevent reactions which generate extreme heat, fire, gases, damage the facility, or other like means that threatens human health & environment. (264.17(b)) | (I) | <input type="checkbox"/> | — | <input checked="" type="checkbox"/> |
| c) Are actions taken in b, documented. (264.17(c))  | (I) | <input type="checkbox"/> | — | <input checked="" type="checkbox"/> |

Rule 606 refers to 40 CFR, Subpart C, 264.30-264.37

PREPAREDNESS AND PREVENTION (264.30)

17. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of hazardous waste or hazardous waste constituent? (264.31)

(I)	<input checked="" type="checkbox"/>	—	—
-----	-------------------------------------	---	---

18. If required, does this facility have the following equipment:

- |  |     |                                     |   |                                     |
|--|-----|-------------------------------------|---|-------------------------------------|
| a) Internal communications or alarm systems? (264.32(a))   | (I) | <input type="checkbox"/>            | — | <input checked="" type="checkbox"/> |
| b) Telephone or 2-way radios at the scene of operations? (264.32(b))   | (I) | <input type="checkbox"/>            | — | <input checked="" type="checkbox"/> |
| c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (264.32(c)) | (I) | <input checked="" type="checkbox"/> | — | —                                   |
| d) Adequate volume of water and/or foam available for fire control? (264.32(d))                                  | (I) | <input checked="" type="checkbox"/> | — | —                                   |

19. Testing and Maintenance of Emergency Equipment:

- |  |     |                                     |   |   |
|--|-----|-------------------------------------|---|---|
| a) Does the owner or operator test and maintain emergency equipment to assure proper operation? (264.33) | (I) | <input checked="" type="checkbox"/> | — | — |
|--|-----|-------------------------------------|---|---|

Comments: \_\_\_\_\_



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Violation		
		Yes	No	N/A
b) Has owner/operator provided immediate access to internal alarms? (264.34(a&b))				
i) When hazardous waste is being poured, mixed, etc.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) One employee on the premises while facility is operating.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment? (264.35)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Rule 607 refers to 40 CFR 264, Subpart D, 264.50-264.56

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (264.50)

20. Does the contingency plan contain the following information:

a) The actions facility personnel must take in response to fires, explosions, or any unplanned release of hazardous waste? (See any PIPP or SPCC plan that can be added to.) (264.52(a)&(b))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Describe arrangements or attempts to make arrangements agreed to by local police and fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, pursuant to (264.52(c)) & (264.37)(a))?	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If local or state authorities decline to enter into such arrangements is the refusal documented. (264.37(b))	(III)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator? (264.52)(d))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
d) A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities? (264.52(e))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) An evacuation plan for facility personnel if evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) (264.52(f))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Emergency Coordinator and Emergency Procedures:				
a) Is coordinator familiar with all aspects of site operation and emergency procedures? (264.55)	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the emergency coordinator have the authority to carry out the contingency plan? (264.55)	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures? (264.56)	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Plan Amendments and Copies:				
a) Has the contingency plan been amended to reflect changes in regulations, plan factor changes in the facility, list of emergency coordinators, changes in emergency equipment? (264.54)	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Are copies of the contingency plan available on site and local emergency organizations? (264.53)	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: \_\_\_\_\_



Treatment/Storage/Disposal Facility  
Form D

Violation  
Class Yes No N/A

USE OF MANIFESTS (Rule 608: 40 CFR 264.71 & 264.72)

23. If the facility receives hazardous waste accompanied by a manifest, does the facility: *Not operating yet*
- |  |         |   |                                     |
|--|---------|---|-------------------------------------|
| a) Sign & date each copy.<br>(608(1)(a): 264.71(a)(1))   | (I) [ ] | — | <input checked="" type="checkbox"/> |
| b) Note any significant discrepancies.<br>(608(1)(b): 264.71(a)(2))  | (I) [ ] | — | <input checked="" type="checkbox"/> |
| c) Give the transporter 1 signed copy of the manifest. (608(1)(c): 264.71(a)(3))   | (I) [ ] | — | <input checked="" type="checkbox"/> |
| d) Copy sent to generator w/in 30 days and MDNR w/in 10 days after the end of the month in which the waste was received. (608(1)(d&f): 264.71(a)(4)) | (I) [ ] | — | <input checked="" type="checkbox"/> |
| e) Retain copy on-site. (608(1)(e): 264.71(a)(5))  | (I) [ ] | — | <input checked="" type="checkbox"/> |
24. If applicable, comply with requirement for bulk shipments of hazardous waste by rail or water transporter. (608(2): 264.71(b))
- |  |         |   |                                     |
|--|---------|---|-------------------------------------|
|  | (I) [ ] | — | <input checked="" type="checkbox"/> |
|--|---------|---|-------------------------------------|
25. Notify the Director if a significant discrepancy is not corrected with the generator within 15 days. (608(4): 264.72))
- |  |         |   |                                     |
|--|---------|---|-------------------------------------|
|  | (I) [ ] | — | <input checked="" type="checkbox"/> |
|--|---------|---|-------------------------------------|

RECORDKEEPING (Rule 609: 40 CFR 264.73 & 264.74)

26. Does the owner/operator maintain an operating record on-site with the following information recorded.
- |  |          |   |                                     |
|--|----------|---|-------------------------------------|
| a) Description and quantity of hazardous waste received and method(s)/ date of its treatment, storage or disposal. (609(1)(a): 264.73(b)(1))     | (II) [ ] | — | <input checked="" type="checkbox"/> |
| b) Location & quantity of each hazardous waste within the facility (cross-referenced to specific manifest #) on a map. (609(1)(b): 264.73(b)(2)) | (II) [ ] | — | <input checked="" type="checkbox"/> |
| c) Records and results of all waste analysis, trial tests, monitoring data, and operator inspections. (609(1)(c): 264.73(b)(3))                  | (II) [ ] | — | <input checked="" type="checkbox"/> |
| d) Reports detailing all incidents that required implementation of the Contingency Plan. (609(1)(d): 264.73(b)(4))                               | (II) [ ] | — | <input checked="" type="checkbox"/> |



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
e) Records & results of inspections in 264.15 (question 11). (609(1)(e): 264.73(b)(5))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) If required, monitoring, testing or analytical when required by construction permit or operating license. (609(1)(f): 264.73(b)(6))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Notices to generator (question 4) and records of rejected loads. (609(1)(g&h): 264.73(b)(7))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Closure and post-closure cost estimates. (609(1)(j): 264.73(b)(8))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Annual certification by permittee that a program is in place to reduce the volume and toxicity of hazardous waste he generates and activities on-site use methods to minimize threat to human health and environment. (264.73(b)(9)).	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) If applicable, quantity and date of placement of in a land disposal unit of waste with an extension to the land disposal restriction. (609(1)(k): 264.73(b)(10))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k) For off-site treatment, a copy of notice or certification/demonstration from the generator. (609(1)(l): 264.73(b)(11))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l) For on-site treatment, information contained in a notice (except manifest #) or certification/demonstration. (609(1)(m): 264.73(b)(12))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
m) For off-site land disposal, a copy of notice or certification/demonstration from the generator. (609(1)(n): 264.73(b)(13))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n) For on-site land disposal, information contained in a notice (except manifest #) or certification/demonstration. (609(1)(o): 264.73(b)(14))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o) For off-site storage, a copy of notice or certification/demonstration from the generator. (264.73(b)(15))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
p) For on-site storage, information contained in a notice (except manifest #) or certification/demonstration. (264.73(b)(16))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
q) Any other records required to be kept by the operating license. (609(1)(p))	(N/A)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Treatment/Storage/Disposal Facility  
Form D

		Violation	Yes	No	N/A
		Class			
27.	Are all required records maintained and available for inspection. (609(2&3): 264.74(a))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: \_\_\_\_\_

REPORTING (Rule 610: 40 CFR 264.75 - 264.76)

28.	Has the owner/operator submitted a biennial report to the Regional Administrator by March 1 of even numbered years. (610: 264.75)	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-----	---	------	-------------------------------------	--------------------------	--------------------------

*Not operating yet.*

29. If hazardous waste is received from off-site has:  
(610(2): 264.76)

a)	The facility accepted any waste without a manifest or shipping paper.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
----	---	-----	--------------------------	--------------------------	-------------------------------------

b)	If 'a' is yes, was the Director provided with a report with in 15 days.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
----	---	-----	--------------------------	--------------------------	-------------------------------------

30.	Has the owner/operator of a hazardous waste disposal/treatment on the site of generation submitted a monthly report to the Director. (610(3))	(N/A)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
-----	---	-------	--------------------------	--------------------------	-------------------------------------

ENVIRONMENTAL MONITORING (Rule 611)

31.	If applicable, has the TSDF carried out their environmental monitoring program.	(N/A)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
-----	---	-------	-------------------------------------	--------------------------	-------------------------------------

*For new huz. cell*

RELEASES FROM SOLID WASTE MANAGEMENT UNITS (264 Subpart F)

32.	Did owner/operators comply with 264.101 for all solid waste management units.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
-----	---	-----	--------------------------	--------------------------	-------------------------------------

Did facilities with surface impoundments, waste piles and land treatment units receiving waste after 7-26-82 comply with 264.91 thru 264.100 in lieu of 264.101 for releases to the upper-most aquifer (see exceptions). (264.90(a)(2)&(b))

(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
-----	--------------------------	--------------------------	-------------------------------------

33.	Did the owner/operator subject to this subpart conduct a monitoring/response program. (264.91)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
-----	--	-----	--------------------------	--------------------------	-------------------------------------

34.	Did the owner/operator comply with specifics in the permit (EPA-MSWA permit). (264.92 - 264.101)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
-----	--	-----	--------------------------	--------------------------	-------------------------------------



Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
--------------------	-----	----	-----

CLOSURE AND POST-CLOSURE (Rule 613: 40 CFR Subpart G)

35. Does the facility have a written closure plan. If applicable, do certain surface impoundment and waste piles have contingent closure plans. Does the plan identify: (613(1): 264.112(a&b)) (I) ☒ ☐ ☐
- a) Description of how each hazardous waste unit will be closed. (264.112(b)(1)) (I) ☒ ☐ ☐
- b) Maximum extent unclosure during the facility life with description of final closure. (264.112(b)(2)) (I) ☒ ☐ ☐
- c) Maximum inventory of waste. (264.112(b)(3)) (I) ☒ ☐ ☐
- d) Description of steps to remove or decontaminate equipment, soils, etc. (264.112(b)(4)) (I) ☒ ☐ ☐
- e) Description of other closure activities to satisfy closure performance standards. (264.112(b)(5)) (I) ☒ ☐ ☐
- f) Schedule of closure activities. (264.112(b)(6)) (I) ☒ ☐ ☐
36. Is a written closure cost estimate available and was cost adjusted for inflation. (264.142(a&b)) (I) ☒ ☐ ☐

Note: Disposal facilities need post-closure

37. Does the facility have a written post-closure plan. If applicable do certain surface impoundment and waste piles have contingent closure plans. Does the plan identify: (613(1): 264.118(a&b)) (I) ☒ ☐ ☐
- a) Description of the planned monitoring activities (i.e.: waste piles, etc.). (264.118(b)(1)) (I) ☒ ☐ ☐
- b) Description of maintenance activities and the frequencies for: (264.118(b)(2))
- i) Integrity of cap/final cover or other containment systems. (264.118(b)(2)(i)) (I) ☒ ☐ ☐
- ii) Monitoring equipment. (264.118(b)(2)(ii)) (I) ☒ ☐ ☐
- c) Name, address and phone number of person or office to contact during post-closure care period. (264.118(b)(3)) (I) ☒ ☐ ☐



Treatment/Storage/Disposal Facility  
Form D

- |  | Violation<br>Class | Yes                                 | No                       | N/A                                 |
|--|--------------------|-------------------------------------|--------------------------|-------------------------------------|
| 38. Is a written post-closure cost estimate available and was cost adjusted for inflation. (264.142(a&b)) (I)  | (I)                | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 39. If changes to the approved closure or post-closure plan were made did the owner/operator first submit a written request to make said changes. (264.112(c)) (I) | (I)                | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Rule 614 refers to 40 CFR, Subpart I, 264.170-264.178

USE AND MANAGEMENT OF CONTAINERS IN STORAGE (Rule 614: 40 CFR 264 Subpart I)

- |  |       |                          |                          |                                     |
|--|-------|--------------------------|--------------------------|-------------------------------------|
| 40. Is each container labeled or marked clearly with the words "Hazardous Waste"? (614(1)(b))<br>If no, how many _____?  | (N/A) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 41. Are containers in good condition? (264.171)<br>If no, specifically what is their condition? _____.   | (I)   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 42. Are containers compatible with waste in them? (264.172) If no, explain _____.  | (I)   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 43. Are containers stored closed? (264.173(a))<br>If no, how many _____?   | (I)   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 44. Are containers managed to prevent leaks? (264.173(b)) If no, explain _____.  | (I)   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 45. Are containers inspected weekly for leaks and defects? (264.174)   | (I)   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 46. Container storage areas must have a containment system designed and operated as follows if the waste contains free liquids or is F020, F021, F022, F023, F026, F027:<br><br>a) Impervious base free of cracks? (264.175(b)(1)) | (I)   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
b) Sloped or otherwise designed to elevate or protect containers from contact with accumulated liquids? (264.175(b)(2))	(I) [ ]	—	—	✓
c) Containment capable of holding 10% of volume of containers or 10% of largest container, whichever is greater? (264.175(b)(3))	(I) [ ]	—	—	✓
d) Run-on prevented unless capacity in excess of question 46(c)? (264.175(b)(4))	(I) [ ]	—	—	✓
e) Accumulated liquids (waste and/or precipitation) removed in a timely manner to prevent overflow? (264.175(b)(5))	(I) [ ]	—	—	✓
47. If stored hazardous waste is solid (other than F020, F021, F022, F023, F026, F027) is the storage area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c))	(I) [ ]	—	—	✓
48. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from property line? (Indicate if waste is ignitable or reactive.) (264.176) If no, explain _____.	(I) [ ]	—	—	✓
49. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 264.17(b) apply.) (264.177(a)) If no, explain _____.	(I) [ ]	—	—	✓
50. Are hazardous wastes placed in containers that previously held incompatible material. (264.177(b))	(I) —	—	[ ]	✓
51. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? (264.177(c))	(I) [ ]	—	—	✓

PRE-TRANSPORT REQUIREMENTS (Rule 305: 40 CFR 262.30)

52. Is waste packaged in accordance with DOT regulations (required prior to movement of hazardous waste off-site)? (Rule 305(1)(a): 40 CFR 262.30).	company rep said observed	—	—	✓
	(I) [ ]	—	—	—
53. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous materials (required prior to movement of hazardous waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.31 & 262.32(a))	company rep said observed	—	—	✓
	(I) [ ]	—	—	—



Treatment/Storage/Disposal Facility  
Form D

5 On containers of 110 gallons or less, does the appropriate information displayed include a warning and generator's name, address, manifest document number and waste code as required in 40 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))

company rep said \_\_\_\_  
observed \_\_\_\_

(I) [ ] \_\_\_\_ ✓

55. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)

company rep said \_\_\_\_  
observed \_\_\_\_

(I) [ ] \_\_\_\_ ✓

Comments:

Facility is I.C.



NATURAL RESOURCES  
COMMISSION

JERRY C. BARTNIK  
LARRY DEVUYST  
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AMES HILL  
DAVID HOLLI  
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STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48909

ROLAND HARMES, Director

RECEIVED

JAN 10 1994

WASTE MANAGEMENT DIV.

January 6, 1994

Mr. Jerome Amber, P.E.  
Manager, Wastes and Hazardous Substances  
Ford Motor Company  
15201 Century Drive, Suite 608  
Dearborn, Michigan 48120

Dear Mr. Amber:

SUBJECT: Cell II Construction Certification,  
Ford Allen Park Clay Mine, MID 980 568 711

The Waste Management Division has reviewed the construction certification documents for Cell II dated June 16, 1993, and December 16, 1993. These documents satisfactorily demonstrate that the cell was constructed in accordance with the approved design plans and the construction quality assurance plans contained in the operating license for the Ford Allen Park Clay Mine, issued pursuant to 1979 PA 64, as amended, the Hazardous Waste Management Act. The construction certification for Cell II is hereby approved.

If you have any questions, please contact Mr. Peter Quackenbush at Waste Management Division, Department of Natural Resources, P.O. Box 30241, Lansing, Michigan 48909, or at telephone number 517-373-7397.

Sincerely,

Jim Sygo, Chief  
Waste Management Division  
517-373-9523

cc: Mr. Richard Traub, U.S. EPA  
Ms. Lorraine Kosik, U.S. EPA  
Dr. Ben Okwumabua, DNR-Livonia  
Mr. Ken Burda, DNR/Operating License File  
Mr. Peter Quackenbush, DNR  
Mr. Tarik Namour, DNR

*Larry A  
Chris*



Act 64/RCRA Inspection Report

ACT 64/RCRA INSPECTION REPORT

I.D. Number (U.S. EPA or Michigan) M 1D940568711

FACILITY NAME

Ford Motor Company Allen Park Clay Mine

Mailing Address

Ste 608 15201 Century Dr.

Dearborn

City

Michigan

48120

Zip Code

DATE

6/24/93

TIME (from)

11:30

(to)

12:30

PERSON(S) INTERVIEWED

TITLE

TELEPHONE #

Jeff Hartman

FMC

Gary Shockley

WMC

313-390-3209

David Hunsden

II

INSPECTOR(S)

AGENCY

TELEPHONE #

Kurt Childs

MDNR

313-953-1702

Primary Business of this Facility:

Landfill

☐ you discharge a process wastewater to the local POTW, that would otherwise  
a RCRA regulated hazardous waste? ☒ yes ☐ no

Reason for Inspection:

☒ Routine

☐ Follow-up

☐ Complaint



Act 64/RCRA Inspection Report

Based upon the inspection, this facility:

FORM

\_\_\_\_\_ does not generate any hazardous waste  
\_\_\_\_\_ conditionally exempt small quantity generator E  
\_\_\_\_\_ small quantity generator inspection form - - - - - - - - -A  
\_\_\_\_\_ generator inspection form B  
\_\_\_\_\_ generator tank(s) system inspection form - - - - - - - - -B1  
\_\_\_\_\_ transporter inspection form C  
\_\_\_\_\_ boilers and industrial furnaces - - - - - - - - - - - F

PERMITTED TSDF

\_\_\_\_\_ treatment/storage/disposal facility (Subpart A-E & I) - - - - -D  
\_\_\_\_\_ generator appendix inspection form D1  
\_\_\_\_\_ TSDF tank system inspection form (Subpart J) - - - - -D2  
\_\_\_\_\_ surface impoundments inspection form (Subpart K) D3  
\_\_\_\_\_ waste piles inspection form (Subpart L) - - - - -D4  
\_\_\_\_\_ land treatment inspection form (Subpart M) D5  
☒ \_\_\_\_\_ landfill inspection form (Subpart N) - - - - -D6  
\_\_\_\_\_ incineration inspection form (Subpart O) D7  
\_\_\_\_\_ miscellaneous units, inspection form (Subpart X) - - - - -D8

INTERIM STATUS TSDF

\_\_\_\_\_ treatment/storage/disposal facility (Subpart A-E & I) - - - - -D9  
\_\_\_\_\_ generator appendix inspection form D1  
\_\_\_\_\_ groundwater monitoring (Subpart F) use w/ Subparts K,L,M&N D10  
\_\_\_\_\_ TSDF tank system inspection form (Subpart J) - - - - -D2  
\_\_\_\_\_ surface impoundments inspection form (Subpart K) D11  
\_\_\_\_\_ waste piles inspection form (Subpart L) - - - - -D12  
\_\_\_\_\_ land treatment inspection form (Subpart M) D13  
\_\_\_\_\_ landfills inspection form (Subpart N)- - - - -D14  
\_\_\_\_\_ incineration & thermal treatment inspection form (Subpart O&P) D15  
\_\_\_\_\_ chemical, physical & biological treatment form (Subpart Q) - - -D16

COMMENTS:

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PERMITTED LANDFILL INSPECTION FORM

Facility's Name

ENC Allen Park City Muni

INSPECTION FORM D6

Part 6 Rules

P.A. 64 of 1979

Date

6/28/93

I.D. #

MD940368711

Rule 619 refers to 40 CFR, Part 264, Subpart N, 264.300-264.351

Violation

Class

Yes

No

N/A

DESIGN AND OPERATING REQUIREMENTS (264.301)

1) Any landfill (except a new landfill, new unit, replacement, or lateral expansion at an existing landfill) must have:

a) A liner which is constructed and installed to prevent migration of waste. The liner must be:

i) Constructed of materials that have appropriate chemical properties, sufficient strength and thickness. (264.301(a)(1)(i))

(I) [X]          

ii) Placed on a foundation or base capable of providing support and resistance to pressure gradients. (264.301(a)(1)(ii))

(I) [X]          

iii) Installed to cover all surrounding earth likely to be in contact with waste or leachate. (264.301(a)(1)(iii))

(I) [X]          

b) A leachate collection and removal system immediately above the liner. (264.301(b))

(I) [X]          

OR

2) Received an exemption from the existing liner requirements from the Director. (264.301(b))

(I) [  ]               

Comments:



Landfill Inspection Form  
Form D6

	Violation Class	Yes	No	N/A
3) The owner/operator of a new landfill, new unit, replacement, or lateral expansion at an existing landfill must have:				
a) Met the requirements of R 299.9620(2). (Rule 619(2))	(N/A)	<input checked="" type="checkbox"/>	—	—
b) Two or more liners. (264.301(c))	(I)	<input checked="" type="checkbox"/>	—	—
c) Leachate collection system above and between liners. (264.301(c))	(I)	<input checked="" type="checkbox"/>	—	—
OR				
d) Approval for alternate design from Director. (264.301(d & e))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
4) Operates and maintains a leak detection, collection and removal system between the liners as per R 299.9622. (Rule 619(3))	(N/A)	<input checked="" type="checkbox"/>	—	—
5) The owner/operator must operate and maintain a run-on control system to stop flow onto active portion (minimum 25-year storm). (264.301(f))	(I)	<input checked="" type="checkbox"/>	—	—
6) The owner/operator must operate and maintain a run-off system to collect and control water (minimum 25-year storm). (264.301(g))	(I)	<input checked="" type="checkbox"/>	—	—
7) Were collection and holding units (ex: tanks) for run-on and run-off emptied or other wise managed right after a storm. (264.301(h))	(I)	<input checked="" type="checkbox"/>	—	—
8) If landfill is subject to wind disposal is it covered or controlled to stop wind dispersal. (264.301(i))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_

MONITORING AND INSPECTIONS (264.303)

- |  |     |                                     |   |   |
|--|-----|-------------------------------------|---|---|
| 9) During installation were liners and cover systems inspected (ex: uniformity, damage, etc.) (264.303(a)) | (I) | <input checked="" type="checkbox"/> | — | — |
|--|-----|-------------------------------------|---|---|



Landfill Inspection Form  
Form D6

	Violation Class	Yes	No	N/A
10) Immediately after construction or installation of liner(s) or cover system(s) were:				
a) Synthetic cover and liners inspected to ensure:				
i) Tight seams and joints. (264.303(a)(1))	(I)	<input checked="" type="checkbox"/>	___	___
ii) Absence of tears, punctures or blisters. (264.303(a)(1))	(I)	<input checked="" type="checkbox"/>	___	___
b) Soil-based and admixed liner and covers inspected for imperfections (ex: lenses, cracks, root holes, etc.) (264.303(a)(2))	(I)	<input checked="" type="checkbox"/>	___	___
11) While a landfill is in operation, was it inspected weekly and after storms for:				
a) Deterioration, malfunction or improper operation of run-on and run-off control systems. (264.303(b)(1))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>
b) Proper functioning of wind dispersal system. (264.303(b)(2))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>
c) Presence of leachate in and proper functioning of leachate collection and removal system. (264.303(b)(3))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>

SURVEYING AND RECORDKEEPING (264.309)

12) Does the owner/operator maintain the following in the operating record:				
a) A map of each cell (location & dimension). (264.309(a))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>
b) Contents of cell and location of each waste type. (264.309(b))	(I)	<input type="checkbox"/>	___	<input checked="" type="checkbox"/>

Comments: Not Accepting Waste yet

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



Landfill Inspection Form  
Form D6

Violation Class	Yes	No	N/A
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SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE (264.312)

13) Ignitable or reactive waste must not be placed in a landfill unless:

a) The waste is treated, etc. before or after placement in the landfill so:

i) The waste/mixture is no longer ignitable or reactive. (264.312(a)(1))

(I) [ ]    X

ii) Taken precautions to prevent reactions which generate extreme heat, fire, gases, damage the facility, or other like means that threatens human health & environment. (264.312(a)(2) refers to 264.17(b))

(I) [ ]    X

EXCEPT

b) Ignitable waste in containers is protected for conditions/material which may cause it to ignite or react can be landfilled. (264.312(b))

(I) [ ]    X

SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES (264.313)

14) Incompatible wastes must not be placed in the same landfill cell unless 264.17(b) is complied with. (264.313)

(I) [ ]    X

DISPOSAL OF SMALL CONTAINERS OF HAZARDOUS WASTE IN OVERPACKED DRUMS (LAB PACKS) (264.316)

15) Small containers in overpack drums may be landfilled if:

a) Containers are:

i) Non-leaking. (264.316(a))

(I) [ ]    X

ii) Won't react, ignite or dangerously decompose with other container waste. (264.316(a))

(I) [ ]    X

iii) Container uses meets DOT and is sealed. (264.316(a))

(I) [ ]    X



Landfill Inspection Form  
Form D6

	Violation Class	Yes	No	N/A
b) Overpack is:				
i) Meets DOT. (264.316(b))	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Maximum 110 gallons. (264.316(b))	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Sufficient absorbent used that will not react, ignite or dangerously decompose with waste. (264.316(b&c))	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
16) Were incompatible wastes placed in same container. (264.316(d))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17) Were reactive wastes (other than cyanide or sulfide bearing) treated. (264.316(e))	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

SPECIAL REQUIREMENTS FOR HAZARDOUS WASTES F020, F021, F022, F023, F026 AND F027. (264.317)

18) Were F020, F021, F022, F023, F026 and F027 placed in a landfill without an approved plan from the Director. (264.317(a))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	-----	-------------------------------------	--------------------------	-------------------------------------

CLOSURE AND POST-CLOSURE CARE (264.310)

19) Did the owner/operator close the landfill in compliance with 264.310 and R 299.619(5).	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
--	-----	--------------------------	-------------------------------------	-------------------------------------

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



PERMITTED TREATMENT/STORAGE/DISPOSAL FACILITY  
INSPECTION FORM

Facility's Name

Ford Motor Co. Allen Park City Mich

INSPECTION FORM D

Part 6 Rules

P.A. 64 of 1979

Date

6/24/93

I.D. #

MI D946568711

This facility, in addition being a treatment, storage &/or disposal facility:

☐ Generates Hazardous Waste (also use Form D1)

☐ Transports Hazardous Waste (also use Form C)

This facility:

☐ Accepts waste from off-site sources

☐ Handles only its own waste

If applicable, hazardous waste is stored in:

☐ Container(s) (drums, totes, roll-off boxes, etc)

Number of units

☐ Tank(s) (also use Form D2)

☐ Waste pile(s) (also use Form D4)

☐ Surface Impoundment(s) (also use Form D3)

☐ Miscellaneous Unit(s) (also use Form D8)

If applicable, hazardous wastes are treated in:

☐ Surface Impoundment(s) (also use Form D3)

☐ Waste pile(s) (also use Form D4)

☐ Land treatment (also use Form D5)

☐ Incinerator (also use Form D7)

☐ Aboveground tank(s) (also use Form D2)

☐ Underground tank(s) (also use Form D2)

☐ Container(s)

☐ Miscellaneous Unit(s) (also use Form D8)

If applicable, hazardous waste are disposed in:

☐ Surface Impoundment(s) (also use Form D3)

☐ Land treatment (also use Form D5)

☒ Landfill (also use Form D6)

☐ Incinerator (also use Form D7)

☐ Miscellaneous Unit(s) (also use Form D8)

WASTE STREAM(S)

HAZARDOUS WASTE #

CODE/NAME

SOURCE

TYPE OF

STORAGE

HOW MUCH/

TIME PERIOD

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Treatment/Storage/Disposal Facility  
Form D

HAZARDOUS WASTE # <u>CODE/NAME</u>	<u>SOURCE</u>	<u>TYPE OF STORAGE</u>	<u>HOW MUCH/ TIME PERIOD</u>

LAND BAN WASTE                      YES \_\_\_\_\_ NO \_\_\_\_\_

Comments: Management of Landfill Takeover From  
City By Vote NGT of NT on 5/3/97

Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
--------------------	-----	----	-----

ENVIRONMENTAL AND HUMAN HEALTH STANDARDS GENERALLY (Rule 602)

1. Is the TSDF operated in a manner that will prevent the following:

- |  |       |                          |     |                                     |
|--|-------|--------------------------|-----|-------------------------------------|
| a) Violations of Federal Clean Water Act or Act 245. (Rule 602(1)(a))  | (N/A) | <input type="checkbox"/> | ___ | <input checked="" type="checkbox"/> |
| b) Air emissions in violation of the Federal Clean Air Act or Act 348. (Rule 602(1)(b))                          | (N/A) | <input type="checkbox"/> | ___ | <input checked="" type="checkbox"/> |
| c) Degradation, as defined in act 245, of a sole-source aquifer. (Rule 602(1)(c))                                | (N/A) | <input type="checkbox"/> | ___ | <input checked="" type="checkbox"/> |
| d) Exposure of humans or the environment to harmful quantities of hazardous waste/constituents. (Rule 602(1)(d)) | (N/A) | <input type="checkbox"/> | ___ | <input checked="" type="checkbox"/> |
| e) Pollution, impairment or destruction of natural resources of the state. (Rule 602(1)(e))                      | (N/A) | <input type="checkbox"/> | ___ | <input checked="" type="checkbox"/> |

FACILITY DESIGN AND OPERATING STANDARDS (Rule 604)

2. If applicable, are the following maintained at the TSDF:

- |  |       |                                     |     |     |
|--|-------|-------------------------------------|-----|-----|
| a) A run-on control system for a 24-hour, 25-year storm. (Rule 604(1)(a))          | (N/A) | <input checked="" type="checkbox"/> | ___ | ___ |
| b) A run-off management system for a 24-hour, 100-year storm. (Rule 604(1)(b))     | (N/A) | <input checked="" type="checkbox"/> | ___ | ___ |
| c) Systems to prevent hazardous waste/constituents from escaping. (Rule 604(1)(c)) | (N/A) | <input checked="" type="checkbox"/> | ___ | ___ |

Rule 605 refers to 40 CFR 264, Subpart B, 264.10-264.18

GENERAL FACILITY STANDARDS (264.11 & 264.12)

- |  |      |                                     |     |                                     |
|--|------|-------------------------------------|-----|-------------------------------------|
| 3. Does the facility have an EPA id #. (264.11)  | (I)  | <input checked="" type="checkbox"/> | ___ | ___                                 |
| 4. If required, have the following been notified:  |      |                                     |     |                                     |
| a) Director of receipt of hazardous waste from a foreign source. (264.12(a))   | (II) | <input type="checkbox"/>            | ___ | <input checked="" type="checkbox"/> |
| b) The generator that the TSDF has permit(s) for and will accept the generators waste (copy of letters in operating record). (264.12(b)) | (II) | <input type="checkbox"/>            | ___ | <input checked="" type="checkbox"/> |

Treatment/Storage/Disposal Facility  
Form D

Violation  
Class

Yes

No

N/A

- c) Director on change in owner/operator.  
(264.12(c))

(II)

[ ]

—

X

GENERAL WASTE ANALYSIS (264.13)

5. Has the owner/operator obtained a detailed chemical and physical analysis of the waste. (264.13(a)(1)) (I) [ ] — X
6. If necessary, has analysis been repeated to ensure it accurate. (264.13(a)(3)) (I) [ ] — X
7. If necessary, is waste received from off-site inspected/analyzed to determine if it matches the manifest. (264.13(a)(4)) (I) [ ] — X
8. Does the owner/operator have a detailed waste analysis plan on file at the facility, (I) X [ ] — —
- Does the plan include:
- a) The parameters to analyze waste. (264.13(b)(1)) (I) X [ ] — —
- b) Test and sampling methods. (264.13(b)(2&3)) (I) X [ ] — —
- c) Frequency initial analysis will be reviewed or repeated. (264.13(b)(4)) (I) X [ ] — —
- d) Off-site waste analysis from generator and any additional analysis required. (264.13(b)(5&6)) (I) X [ ] — —
- e) For surface impoundments, exempt from land disposal restrictions under 268.4(a), the following schedule and procedures:
- i) Sampling of impoundments. (264.13(b)(7)(i)) (I) [ ] — X
- ii) Analysis of test data and annual removal of residues. (264.13(b)(7)(ii&iii)(A)(B)(1-2)) (I) [ ] — X
9. Does the waste analysis plan specify procedures for inspection and analysis of each off-site waste to ensure that it matches the manifest. (264.13(c)) (I) X [ ] — —

Comments:

Facility not operating yet

Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
-----------------	-----	----	-----

SECURITY (264.14)

10. Is unknowing entry prevented into active portion (unless demonstrated to Director the physical contact and disturbance will not cause a violation), by:

a) 24-hour surveillance. (264.14(b)(1)) (I) ☒ ☐ ☐

OR

b) Artificial or natural barrier and controlled entry. (264.14(b)(2)(i&ii)) (I) ☒ ☐ ☐

c) Danger sign(s) at entrance. (264.14(c)) (I) ☒ ☐ ☐

GENERAL INSPECTION REQUIREMENTS (264.15)

11. Does the owner/operator inspect the facility for malfunctions, deterioration, operator errors and discharges of hazardous waste that may effect human health or the environment. (264.15(a))

(II) ☒ ☐ ☐

12. Does the owner/operator have a written inspection schedule kept at the facility with the following: (264.15(b)(1&2))

a) Monitoring equipment. (264.15(b)(1)) (II) ☒ ☐ ☐

b) Safety & emergency equipment. (264.15(b)(1)) (II) ☒ ☐ ☐

c) Security devices. (264.15(b)(1)) (II) ☒ ☐ ☐

d) Operating and structural equipment (i.e.: dikes, pumps, etc.) 264.15(b)(1)) (II) ☒ ☐ ☐

e) Types of problems to be looked for (i.e.: leaky fittings, eroding dike, etc.) (264.15(b)(3)) (II) ☒ ☐ ☐

f) Inspection frequency based on: (264.15(b)(4)) (II) ☒ ☐ ☐

i) Possible deterioration rate of equipment. (II) ☒ ☐ ☐

ii) Areas subject to spills daily. (II) ☒ ☐ ☐

13. Does the owner/operator keep a record of inspections in an inspection log at the facility that contains the following: (264.15(b)(2) & (d))

i) Date and time of inspection. (II) ☒ ☐ ☐

old log end 5/19/93

No logs after 5/19/93

Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
-----------------	-----	----	-----

- |   |      |                                     |                          |                          |
|---|------|-------------------------------------|--------------------------|--------------------------|
| ii) Name of the inspector.                                | (II) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| iii) Notation of observations made.                       | (II) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| iv) Date and nature of repairs or other remedial actions. | (II) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

14. Were malfunctions/deterioration of equipment or structures remedied on a schedule which ensures that the problem does not lead to an environmental or human health hazard. And where a hazard is imminent or already occurred remedial action is taken immediately. (264.15(c))

(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-----	-------------------------------------	--------------------------	--------------------------

Comments:

5/19/93 Discontinue inspection

PERSONNEL TRAINING (264.16)

Could not inspect  
Records not available

15. Do personnel training records contain the following:

- |   |      |                          |                          |                          |    |
|---|------|--------------------------|--------------------------|--------------------------|----|
| a) Job title? (264.16(d)(1))  | (II) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NI |
| b) Job descriptions? (264.16(d)(2))   | (II) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NI |
| c) Name of employee filling jobs? (264.16(d)(1))  | (II) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NI |
| d) Description of type & amount of both introductory and continued training? (264.16(d)(3))                                   | (II) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NI |
| e) Is training designed to ensure that facility personnel are able to respond effectively to emergencies? (264.16(a)(3))      | (I)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NI |
| d) Records of training? (264.16(d)(4))  | (II) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NI |
| e) Do new personnel receive required training within 6 months? (264.16(b))  | (I)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NI |
| f) Do personnel training records indicate that personnel have taken part in an annual review of initial training? (264.16(c)) | (I)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NI |

Comments:

New employees, need training by Oct.  
old records passed along by city when they were  
Personnel Records Not Available,  
All New staff as of 5/3/93

Treatment/Storage/Disposal Facility  
Form D

Violation	Yes	No	N/A
Class			

GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTE (264.17)

16. If required, are the following taken:

- |   |     |                          |   |          |
|---|-----|--------------------------|---|----------|
| a) Ignitable/reactive waste separated and protected from ignition sources with 'No smoking' signs. (264.17(a))  | (I) | <input type="checkbox"/> | — | <u>S</u> |
| b) Precautions to prevent reactions which generate extreme heat, fire, gases, damage the facility, or other like means that threatens human health & environment. (264.17(b)) | (I) | <input type="checkbox"/> | — | <u>b</u> |
| c) Are actions taken in b, documented. (264.17(c))  | (I) | <input type="checkbox"/> | — | <u>X</u> |

Rule 606 refers to 40 CFR, Subpart C, 264.30-264.37

PREPAREDNESS AND PREVENTION (264.30)

17. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of hazardous waste or hazardous waste constituent? (264.31)

(I)	<input checked="" type="checkbox"/>	—	—
-----	-------------------------------------	---	---

18. If required, does this facility have the following equipment:

- |  |     |                                     |   |   |
|--|-----|-------------------------------------|---|---|
| a) Internal communications or alarm systems? (264.32(a))   | (I) | <input checked="" type="checkbox"/> | — | — |
| b) Telephone or 2-way radios at the scene of operations? (264.32(b))   | (I) | <input checked="" type="checkbox"/> | — | — |
| c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (264.32(c)) | (I) | <input checked="" type="checkbox"/> | — | — |
| d) Adequate volume of water and/or foam available for fire control? (264.32(d))                                  | (I) | <input checked="" type="checkbox"/> | — | — |

19. Testing and Maintenance of Emergency Equipment:

- |  |     |                                     |   |   |
|--|-----|-------------------------------------|---|---|
| a) Does the owner or operator test and maintain emergency equipment to assure proper operation? (264.33) | (I) | <input checked="" type="checkbox"/> | — | — |
|--|-----|-------------------------------------|---|---|
- Annual*

Comments: \_\_\_\_\_

Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
b) Has owner/operator provided immediate access to internal alarms? (264.34(a&b))				
i) When hazardous waste is being poured, mixed, etc.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) One employee on the premises while facility is operating.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment? (264.35)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Rule 607 refers to 40 CFR 264, Subpart D, 264.50-264.56

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (264.50)

20. Does the contingency plan contain the following information:

a) The actions facility personnel must take in response to fires, explosions, or any unplanned release of hazardous waste? (See any PIPP or SPCC plan that can be added to.) (264.52(a)&(b))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Describe arrangements or attempts to make arrangements agreed to by local police and fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, pursuant to (264.52(c)) & (264.37)(a))?	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If local or state authorities decline to enter into such arrangements is the refusal documented. (264.37(b))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator? (264.52)(d))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
--------------------	-----	----	-----

d) A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities? (264.52(e))

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

e) An evacuation plan for facility personnel if evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) (264.52(f))

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

21. Emergency Coordinator and Emergency Procedures:

a) Is coordinator familiar with all aspects of site operation and emergency procedures? (264.55)

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

b) Does the emergency coordinator have the authority to carry out the contingency plan? (264.55)

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

c) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures? (264.56)

(I)	<input checked="" type="checkbox"/>	—	—
-----	-------------------------------------	---	---

22. Plan Amendments and Copies:

a) Has the contingency plan been amended to reflect changes in regulations, plan factor changes in the facility, list of emergency coordinators, changes in emergency equipment? (264.54)

(II)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
------	--------------------------	---	-------------------------------------

b) Are copies of the contingency plan available on site and local emergency organizations? (264.53)

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

Comments:

Review 62-2-97

Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
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USE OF MANIFESTS (Rule 608: 40 CFR 264.71 & 264.72)

23. If the facility receives hazardous waste accompanied by a manifest, does the facility:

- |  |     |                          |                          |                                     |
|--|-----|--------------------------|--------------------------|-------------------------------------|
| a) Sign & date each copy.<br>(608(1)(a): 264.71(a)(1))   | (I) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Note any significant discrepancies.<br>(608(1)(b): 264.71(a)(2))  | (I) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Give the transporter 1 signed copy of the manifest. (608(1)(c): 264.71(a)(3))   | (I) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Copy sent to generator w/in 30 days and MDNR w/in 10 days after the end of the month in which the waste was received. (608(1)(d&f): 264.71(a)(4)) | (I) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Retain copy on-site. (608(1)(e): 264.71(a)(5))  | (I) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 24. If applicable, comply with requirement for bulk shipments of hazardous waste by rail or water transporter. (608(2): 264.71(b))                   | (I) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 25. Notify the Director if a significant discrepancy is not corrected with the generator with in 15 days. (608(4): 264.72))                          | (I) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

RECORDKEEPING (Rule 609: 40 CFR 264.73 & 264.74)

26. Does the owner/operator maintain an operating record on-site with the following information recorded.

- |  |      |                          |                          |                                     |
|--|------|--------------------------|--------------------------|-------------------------------------|
| a) Description and quantity of hazardous waste received and method(s)/ date of its treatment, storage or disposal. (609(1)(a): 264.73(b)(1))     | (II) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Location & quantity of each hazardous waste within the facility (cross-referenced to specific manifest #) on a map. (609(1)(b): 264.73(b)(2)) | (II) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Records and results of all waste analysis, trial tests, monitoring data, and operator inspections. (609(1)(c): 264.73(b)(3))                  | (II) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Reports detailing all incidents that required implementation of the Contingency Plan. (609(1)(d): 264.73(b)(4))                               | (II) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Treatment/Storage/Disposal Facility  
Form D

		Violation	Yes	No	N/A
		Class			
e)	Records & results of inspections in 264.15 (question 11). (609(1)(e): 264.73(b)(5))	(II)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	—
f)	If required, monitoring, testing or analytical when required by construction permit or operating license. (609(1)(f): 264.73(b)(6))	(II)	<input checked="" type="checkbox"/>	—	—
g)	Notices to generator (question 4) and records of rejected loads. (609(1)(g&h): 264.73(b)(7))	(II)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
h)	Closure and post-closure cost estimates. (609(1)(j): 264.73(b)(8))	(II)	<input checked="" type="checkbox"/>	—	—
i)	Annual certification by permittee that a program is in place to reduce the volume and toxicity of hazardous waste he generates and activities on-site use methods to minimize threat to human health and environment. (264.73(b)(9)).	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
j)	If applicable, quantity and date of placement of in a land disposal unit of waste with an extension to the land disposal restriction. (609(1)(k): 264.73(b)(10))	(II)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
k)	For off-site treatment, a copy of notice or certification/demonstration from the generator. (609(1)(l): 264.73(b)(11))	(II)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
l)	For on-site treatment, information contained in a notice (except manifest #) or certification/demonstration. (609(1)(m): 264.73(b)(12))	(II)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
m)	For off-site land disposal, a copy of notice or certification/demonstration from the generator. (609(1)(n): 264.73(b)(13))	(II)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
n)	For on-site land disposal, information contained in a notice (except manifest #) or certification/demonstration. (609(1)(o): 264.73(b)(14))	(II)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
o)	For off-site storage, a copy of notice or certification/demonstration from the generator. (264.73(b)(15))	(II)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
p)	For on-site storage, information contained in a notice (except manifest #) or certification/demonstration. (264.73(b)(16))	(II)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
q)	Any other records required to be kept by the operating license. (609(1)(p))	(N/A)	<input checked="" type="checkbox"/>	—	—

Violation

Class

Yes

No

N/A

No Inst. After 5/19/97

Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
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27. Are all required records maintained and available for inspection. (609(2&3): 264.74(a)) (II) ☒ ☐ ☐

Comments: \_\_\_\_\_

REPORTING (Rule 610: 40 CFR 264.75 - 264.76)

28. Has the owner/operator submitted a biennial report to the Regional Administrator by March 1 of even numbered years. (610: 264.75) (II) ☒ ☐ ☐

29. If hazardous waste is received from off-site has: (610(2): 264.76)

a) The facility accepted any waste without a manifest or shipping paper. (I) ☐ ☐ ☒

b) If 'a' is yes, was the Director provided with a report with in 15 days. (I) ☐ ☐ ☒

30. Has the owner/operator of a hazardous waste disposal/treatment on the site of generation submitted a monthly report to the Director. (610(3)) (N/A) ☐ ☐ ☒

ENVIRONMENTAL MONITORING (Rule 611)

31. If applicable, has the TSDF carried out their environmental monitoring program. (N/A) ☒ ☐ ☐

RELEASES FROM SOLID WASTE MANAGEMENT UNITS (264 Subpart F)

32. Did owner/operators comply with 264.101 for all solid waste management units. (I) ☐ ☐ ☒

Did facilities with surface impoundments, waste piles and land treatment units receiving waste after 7-26-82 comply with 264.91 thru 264.100 in lieu of 264.101 for releases to the upper-most aquifer (see exceptions). (264.90(a)(2)&(b)) (I) ☐ ☐ ☒

33. Did the owner/operator subject to this subpart conduct a monitoring/response program. (264.91) (I) ☐ ☐ ☒

34. Did the owner/operator comply with specifics in the permit (EPA-HSWA permit). (264.92 - 264.101) (I) ☐ ☐ ☒

Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
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CLOSURE AND POST-CLOSURE (Rule 613: 40 CFR Subpart G)

35. Does the facility have a written closure plan. If applicable, do certain surface impoundment and waste piles have contingent closure plans. Does the plan identify: (613(1): 264.112(a&b)) (I) ☒ ☐ ☐
- a) Description of how each hazardous waste unit will be closed. (264.112(b)(1)) (I) ☒ ☐ ☐
- b) Maximum extent unclosure during the facility life with description of final closure. (264.112(b)(2)) (I) ☒ ☐ ☐
- c) Maximum inventory of waste. (264.112(b)(3)) (I) ☒ ☐ ☐
- d) Description of steps to remove or decontaminate equipment, soils, etc. (264.112(b)(4)) (I) ☒ ☐ ☐
- e) Description of other closure activities to satisfy closure performance standards. (264.112(b)(5)) (I) ☒ ☐ ☐
- f) Schedule of closure activities. (264.112(b)(6)) (I) ☒ ☐ ☐
36. Is a written closure cost estimate available and was cost adjusted for inflation. (264.142(a&b)) (I) ☒ ☐ ☐

Note: Disposal facilities need post-closure

37. Does the facility have a written post-closure plan. If applicable do certain surface impoundment and waste piles have contingent closure plans. Does the plan identify: (613(1): 264.118(a&b)) (I) ☒ ☐ ☐
- a) Description of the planned monitoring activities (i.e.: waste piles, etc.). (264.118(b)(1)) (I) ☒ ☐ ☐
- b) Description of maintenance activities and the frequencies for: (264.118(b)(2))
- i) Integrity of cap/final cover or other containment systems. (264.118(b)(2)(i)) (I) ☒ ☐ ☐
- ii) Monitoring equipment. (264.118(b)(2)(ii)) (I) ☒ ☐ ☐
- c) Name, address and phone number of person or office to contact during post-closure care period. (264.118(b)(3)) (I) ☒ ☐ ☐

Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
38. Is a written post-closure cost estimate available and was cost adjusted for inflation. (264.142(a&b)) (I)	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
39. If changes to the approved closure or post-closure plan were made did the owner/operator first submit a written request to make said changes. (264.112(c)) (I)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Rule 614 refers to 40 CFR, Subpart I, 264.170-264.178

USE AND MANAGEMENT OF CONTAINERS IN STORAGE (Rule 614: 40 CFR 264 Subpart I)

40. Is each container labeled or marked clearly with the words "Hazardous Waste"? (614(1)(b)) If no, how many _____? (N/A)	(N/A)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
41. Are containers in good condition? (264.171) If no, specifically what is their condition? _____ (I)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
42. Are containers compatible with waste in them? (264.172) If no, explain _____ (I)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
43. Are containers stored closed? (264.173(a)) If no, how many _____? (I)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
44. Are containers managed to prevent leaks? (264.173(b)) If no, explain _____ (I)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
45. Are containers inspected weekly for leaks and defects? (264.174) (I)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
46. Container storage areas must have a containment system designed and operated as follows if the waste contains free liquids or is F020, F021, F022, F023, F026, F027:  a) Impervious base free of cracks? (264.175(b)(1)) (I)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
b) Sloped or otherwise designed to elevate or protect containers from contact with accumulated liquids? (264.175(b)(2))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Containment capable of holding 10% of volume of containers or 10% of largest container, whichever is greater? (264.175(b)(3))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Run-on prevented unless capacity in excess of question 46(c)? (264.175(b)(4))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Accumulated liquids (waste and/or precipitation) removed in a timely manner to prevent overflow? (264.175(b)(5))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
47. If stored hazardous waste is solid (other than F020, F021, F022, F023, F026, F027) is the storage area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
48. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from property line? (Indicate if waste is ignitable or reactive.) (264.176) If no, explain _____.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
49. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 264.17(b) apply.) (264.177(a)) If no, explain _____.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
50. Are hazardous wastes placed in containers that previously held incompatible material. (264.177(b))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
51. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? (264.177(c))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

PRE-TRANSPORT REQUIREMENTS (Rule 305: 40 CFR 262.30)

52. Is waste packaged in accordance with DOT regulations (required prior to movement of hazardous waste off-site)? (Rule 305(1)(a): 40 CFR 262.30).	company rep said _____ observed _____	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous materials (required prior to movement of hazardous waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.31 & 262.32(a))	company rep said _____ observed _____	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Treatment/Storage/Disposal Facility  
Form D

54. On containers of 110 gallons or less, does the appropriate information displayed include a warning and generator's name, address, manifest document number and waste code as required in 40 CFR 172.304?  
(Rule 305(1)(d): 40 CFR 262.32(b))

company rep said \_\_\_\_\_  
observed \_\_\_\_\_

( I )      [ \_ ]      \_\_\_\_\_

55. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)

company rep said \_\_\_\_\_  
observed \_\_\_\_\_

( I ) [ \_ ]

Comments:

## RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

## I. General Information

Facility:

U.S. EPA ID No.:

Street:

City:

Telephone:

Inspection Date:

Weather Conditions:

Inspectors:

Facility Representatives:

Ford Motor Company Alpha Park ~~Facility~~ <sup>Slay Mine</sup>  
 MID 960568711  
 15201 Century Dr.  
 Dearborn Alpha Park, MI State: MI Zip: 48120  
 313-322-0700

6/24/93 Time: 11:30 (am/pm)

Overcast ~ 75°

Name

Agency/Title

Telephone

Kurt Childs OWNER 313-953-402

Jeff Antkowiak

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	_____	_____	_____	_____	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List*	_____	_____	_____	_____	_____
First Third [40 CFR 268.10]	_____	_____	_____	_____	<u>X</u>
Second Third [40 CFR 268.11]	_____	_____	_____	_____	_____
Third Third [40 CFR 268.12]	_____	_____	_____	_____	<u>X</u>

\* See Appendix A



## INSPECTION SUMMARY

Processes That Generate LDR Wastes:

LDR Waste Management:

Summary:

Signature:



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## IV. TSD REQUIREMENTS

## A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?  
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
F020-F023 and F026-F028 Dioxins	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
California List Wastes	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
First, Second, and Third Third Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

Comments \_\_\_\_\_

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☒

3. What date was the waste analysis plan last revised? \_\_\_\_/\_\_\_\_/\_\_\_\_

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☒ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

- ☒ Generator provides data  
☐ Facility performs analyses in on-site laboratory  
☒ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ☒ No ☐ NA ☐

If analyses are conducted off site, identify lab: \_\_\_\_\_

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?\* (BDAT\*\* = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☐ No ☐ NA ☒

\*See Appendix C for exceptions.

\*\*BDAT = best demonstrated available technology. See Appendix A.



If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

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- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?\* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐ No ☐ NA ☒

\*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

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- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☐ NA ☒

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

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B. Operating Record [40 CFR 264.73 and 265.73] NA

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☐ No ☐ NA ☒

2. Does the operating record contain copies of LDR notifications and certifications?\* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☐ No ☐ NA ☒

\*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☐ No ☐ NA ☒



Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?\*

Yes ☐ No ☐ NA ☒

\*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

**C. Storage [40 CFR 268.50]**

**1. Are prohibited\* wastes stored on site in containers?**

Yes ☐ No ☒ (If No, go to 2.)

\*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☐ No ☐

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☐

If yes, state how: \_\_\_\_\_

**2. Are prohibited wastes stored on site in tanks?**

Yes ☐ No ☒ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☐ No ☐

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ (If Yes, go to 3.)



Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes \_\_\_ No \_\_\_

If yes, state how: \_\_\_\_\_

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes \_\_\_ No X (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes \_\_\_ No \_\_\_

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes \_\_\_ No \_\_\_

#### D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes \_\_\_ No X (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes \_\_\_ No \_\_\_ NA \_\_\_ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes \_\_\_ No \_\_\_

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes \_\_\_ No \_\_\_ NA \_\_\_



4. Describe all other waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?\*

Yes \_\_\_\_ No \_\_\_\_

\*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes \_\_\_\_ No \_\_\_\_

Comments \_\_\_\_\_

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes \_\_\_\_ No \_\_\_\_ (If No, go to c.)

List the wastes \_\_\_\_\_

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes \_\_\_\_ No \_\_\_\_

If yes, is this method used for the aggregated wastes?

Yes \_\_\_\_ No \_\_\_\_

Comments \_\_\_\_\_

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes \_\_\_\_ No \_\_\_\_

Comments \_\_\_\_\_



7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ☐ No ☐

Comments \_\_\_\_\_

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ☐ No ☐ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ☐ No ☐

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ☐ No ☐ (If No, go to 10.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ☐ No ☐

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ☐ No ☐ (If No, go to E.)



Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes \_\_\_\_ No \_\_\_\_

**E. Surface Impoundments [40 CFR 268.4]**

1. Are restricted wastes placed in surface impoundments for treatment?

Yes \_\_\_\_ No ☒ (If No, go to F.)

List \_\_\_\_\_

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes \_\_\_\_ No \_\_\_\_

Comments \_\_\_\_\_

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes \_\_\_\_ No \_\_\_\_

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes \_\_\_\_ No \_\_\_\_ NA \_\_\_\_

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes \_\_\_\_ No \_\_\_\_

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes \_\_\_\_ No \_\_\_\_

Comments \_\_\_\_\_



7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code \_\_\_\_\_  
 Supernatant Yes ☐ No ☐ Waste Code \_\_\_\_\_

Provide the frequency of analyses conducted on treatment residues:

\_\_\_\_\_

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments \_\_\_\_\_

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments \_\_\_\_\_

#### F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments\*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☐ No ☒ (If No, go to G.)

\*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments \_\_\_\_\_

*Not Accepting Wastewater*



3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?\* [40 CFR 268.9(c)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

\*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes \_\_\_ No \_\_\_

If yes, at what frequency are analyses performed? \_\_\_\_\_

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes \_\_\_ No \_\_\_ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) \_\_\_\_\_

Case-By-Case Extension (40 CFR 268.5) \_\_\_\_\_

No-Migration Petition (40 CFR 268.6) \_\_\_\_\_

Treatment Standard Variance (40 CFR 268.44) \_\_\_\_\_

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes \_\_\_ No \_\_\_ NA \_\_\_

6. Are restricted wastes placed in underground injection wells?

Yes \_\_\_ No \_\_\_ List \_\_\_\_\_



**G. Other Wastestreams**

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ☐ No ☒ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☐

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?\* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☐

\*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ☐ No ☐ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

_____	_____
_____	_____
_____	_____

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☐ No ☐ (If No, go to 4.)



If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes \_\_\_ No \_\_\_ NA \_\_\_

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes \_\_\_ No \_\_\_ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes \_\_\_ No \_\_\_ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes \_\_\_ No \_\_\_ NA \_\_\_ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes \_\_\_ No \_\_\_



5. **Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions**

- a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes \_\_\_\_\_ No \_\_\_\_\_ (If No, go to 6.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>

- b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes \_\_\_\_\_ No \_\_\_\_\_

6. Dilution Prohibition [40 CFR 268.3]:

- a. Are prohibited\* wastes with different treatment standards mixed?

\*See Appendix E for distinction between restricted and prohibited wastes.

Yes \_\_\_\_\_ No \_\_\_\_\_ (If No, go to b.)

List the wastes \_\_\_\_\_

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments \_\_\_\_\_

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes \_\_\_\_\_ No \_\_\_\_\_ (If No, go to c.)

Check appropriate category:

Dilutes to meet treatment standards

Dilutes to render waste non-hazardous



Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act  
☐ Non-toxic\* characteristic wastes  
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

\*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

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- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☐

Comments

**H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

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Act 64/RCRA Inspection Report

ACT 64/RCRA INSPECTION REPORT

U.D. Number (U.S. EPA or Michigan) MID980568711

FACILITY NAME

Ford Motor Co. Allen Park Clay Mine

Mailing Address

Suite 608 152nd Century Dr.

Dearborn  
City

Michigan 48120  
Zip Code

DATE

3/25/93

TIME (from)

9:00

(to)

11:00

PERSON(S) INTERVIEWED

TITLE

TELEPHONE #

Jeff Hartman

313-322-0700

INSPECTOR(S)

AGENCY

TELEPHONE #

Kurt Childs

MDNR

313-953-0241

Primary Business of this Facility:

Landfill

Do you discharge a process wastewater to the local POTW, that would otherwise be a RCRA regulated hazardous waste? ☒ yes ☐ no

Reason for Inspection:

☒ Routine

☐ Follow-up

☐ Complaint



Act 64/RCRA Inspection Report

Based upon the inspection, this facility:

FORM

\_\_\_\_\_ does not generate any hazardous waste  
\_\_\_\_\_ conditionally exempt small quantity generator E  
\_\_\_\_\_ small quantity generator inspection form - - - - - - - - -A  
\_\_\_\_\_ generator inspection form B  
\_\_\_\_\_ generator tank(s) system inspection form - - - - - - - - -B1  
\_\_\_\_\_ transporter inspection form C  
\_\_\_\_\_ boilers and industrial furnaces - - - - - - - - - F

PERMITTED TSDF

☒ treatment/storage/disposal facility (Subpart A-E & I) - - - - -D  
\_\_\_\_\_ generator appendix inspection form D1  
\_\_\_\_\_ TSDF tank system inspection form (Subpart J) - - - - -D2  
\_\_\_\_\_ surface impoundments inspection form (Subpart K) D3  
\_\_\_\_\_ waste piles inspection form (Subpart L) - - - - -D4  
\_\_\_\_\_ land treatment inspection form (Subpart M) D5  
☒ landfill inspection form (Subpart N) - - - - -D6  
\_\_\_\_\_ incineration inspection form (Subpart O) D7  
\_\_\_\_\_ miscellaneous units inspection form (Subpart X) - - - - -D8

INTERIM STATUS TSDF

\_\_\_\_\_ treatment/storage/disposal facility (Subpart A-E & I) - - - - -D9  
\_\_\_\_\_ generator appendix inspection form D1  
\_\_\_\_\_ groundwater monitoring (Subpart F) use w/ Subparts K,L,M&N D10  
\_\_\_\_\_ TSDF tank system inspection form (Subpart J) - - - - -D2  
\_\_\_\_\_ surface impoundments inspection form (Subpart K) D11  
\_\_\_\_\_ waste piles inspection form (Subpart L) - - - - -D12  
\_\_\_\_\_ land treatment inspection form (Subpart M) D13  
\_\_\_\_\_ landfills inspection form (Subpart N)- - - - -D14  
\_\_\_\_\_ incineration & thermal treatment inspection form (Subpart O&P) D15  
\_\_\_\_\_ chemical, physical & biological treatment form (Subpart Q) - - -D16

COMMENTS: ACT 64 PERMIT CHECKLIST  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

MID980568711

Inspector: Kurt Childs  
Date: 3/

*\** A. COVERAGE OF LICENSE

The location of the hazardous waste landfill within the area bounded by I-94, Oakwood Boulevard, M-39, and Outer Drive are covered by this license.

1. Has there been any expansion beyond the covered location or in the landfill design capacity of 646 acre-feet in the Engineering plan of July 6, 1988 ? (Attachment 7)

Y \_\_\_\_\_ N X

If Yes Did the FMC Allen Park get a construction permit from the Director?

Y \_\_\_\_\_ N \_\_\_\_\_

NA

*\** B. Acceptable Waste Types

NA

1. Has Ford Motor Company (FMC) accepted waste other than (Check Manifest):

K061 - Electric furnace emission control dust K087 - Decanter tank tar sludge from coking operations F006 - Wastewater treatment sludge from coking operations D004 - EP Toxic - Arsenic D005 - EP Toxic - Barium D006 - EP Toxic - Cadmium D007 - EP Toxic - Chromium D008 - EP Toxic - Lead D009 - EP Toxic - Mercury D010 - EP Toxic - Selenium D011 - EP Toxic - Silver 001D - EP Toxic - Copper 003D - EP Toxic - Zinc

If yes, list: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

- \** 2. Has the FMC APC accepted, for disposal, any wastes which meet any of the following criteria:

1

NA

2/18/92

Date: \_\_\_\_\_

NOTE: The following shall not be accepted for disposal by this facility.

YES

NO

- a) Ignitable wastes as described in R. 299.9212(1)  
b) Reactive waste as described in R. 299.9212(3)  
c) Bulk or noncontainerized liquid or waste containing free liquids.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

- d) Containers holding free liquids, including lab packs. \_\_\_\_\_
- e) Waste which will do the following: \_\_\_\_\_
- (I) Adversely effect the permeability of the clay liners. \_\_\_\_\_
  - (II) Produce a leakage incompatible with the synthetic liner and leachate collection system, discharge piping and off-site sewer system. \_\_\_\_\_
  - (III) Generate gases which will adversely effect the permeability of the clay cap. \_\_\_\_\_
  - (IV) Create a violation of the 1975 PA 348 (clean air act) and rules promulgated there under. \_\_\_\_\_
- f) Waste which are banned from landfilling unless a variance is obtained from this ban from the regional administrator of EPA. \_\_\_\_\_

\* 3. If Land Ban waste, has FMC submitted a revised Waste Analysis Plan to the Chief of the Waste Management Division (WMD) which describes the procedure to be used to ensure that these waste are not landfilled.

Y \_\_\_\_\_ N \_\_\_\_\_ NA

**Note:** The plan should be submitted for approval 60 days prior to the effective date of such rules. If the effective date is less than 60 days from the promulgated date, the licensee should submit the revised plan no more than 60 days upon which such rules are finalized.

\* 4. Are all waste coming and being accepted placed in a closed container or otherwise totally contained or covered during transportation.

Y \_\_\_\_\_ N \_\_\_\_\_ NA

**C. Landfill Construction and Design Specifications**

The licensee shall do the following prior to constructing cell 2.

YES NO

- a) Did FMC verify that the natural clay base consist of not less than six meter of soil with a maximum permeability of  $1.0 \times 10^{-6}$  (0.000006) cm/sec, or equivalent base approved by Chief of WMD as required under R299.9603.

2

2/18/92

YES NO

Date: \_\_\_\_\_

- b) Did FMC submit documentation for approval by the Chief of the WMD within 60 days of the effective date of this license that section V of the construction quality assurance plan (attachment) was followed during removal of the water from the bottom of the cell 2 to prevent basal heave. If the quality assurance plan is not followed, the FMC will be required to furnish some more



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

information that the natural clay meets the requirement of Act 64. X —

c) Did FMC submit a plan for approval, by the chief of the WMD, within 60 days of the issuance of the license to construct and evaluate a test fill which demonstrates that the proposed design can be constructed in accordance with the approved plans and specification, (attachment 7) and will perform in accordance with the basis of design. X —

d) Has FMC submitted the result of the test fill evaluation and received approval by the Chief of WMD, that the test fill evaluation required in C.I.C. has demonstrated that constructibility and performance of cell 2. X —

e) Has FMC submitted a plan for approval, by the Chief of the WMD, within 60 days of issuance of this license for obtaining additional soil shear strength detail below and lateral, to cell 2 and re-evaluation of the stability of the design slopes. X —

f) Has FMC submitted the data and slope stability evaluation and received approval from the chief of the chief of WMD, that sufficient data has been obtained and the evaluation demonstrates an adequate degree of stability for the design slopes. X —

i. If this evaluation does not demonstrate an acceptable factor of safety, has FMC revised engineering plans and design specification submitted which reflects a new design of the slopes. — — NA

X 2. For cell 2, has FMC designed, constructed, operated and maintained a liner system which complies with R. 299.9619

Y X N

Liner  
Complete  
1/92

X Does the liner include:

(a) A leachate collection and removal system to collect and remove leachate from the landfill. Y X N

3

2/18/92

Date: \_\_\_\_\_

X 2) A composite primary liner which consist of the following:

i) A top component consisting of HDPE synthetic liner which is minimum of 80 mils thick that prevents waste



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

from passing into the liner during active life of the facility. Y\_\_\_\_\_N\_\_\_\_\_

☒ ii) A broken component consisting of compacted clay which is minimum of 150 centimeters thick. Y\_\_\_\_\_N\_\_\_\_\_

☒ c) A leachate detection and collection and removal system. Y\_\_\_\_\_N\_\_\_\_\_

☒ d) A secondary liner consisting of HDPE synthetic liner which is a minimum of 60 mills thick. Y\_\_\_\_\_N\_\_\_\_\_

☒ 3. Is the liner required in condition C.2:

a) Designed and installed in accordance with the specification included in attachment 9 and based on requirement detailed in Michigan Act 64, Rule 299.9621(1)(c) and 299.9620(2). Y\_\_\_\_\_N\_\_\_\_\_

b) Sloped not less than 2% at any point and drain to leachate collection (or leak detection) liners or sumps. Y\_\_\_\_\_N\_\_\_\_\_

4. Has FMC submitted a program for demonstrating compatibility of leachate with the specified synthetic liner and all other construction material to be used within 21 days of the effective date of this license.

i. Was the approved compatibility testing program conducted and the result evaluated with respect to the basis of the design requirements. Y\_\_\_\_\_N\_\_\_\_\_

☒ 5. Has FMC designed, constructed, operated and maintained a leachate collection and removal system to collect and remove leachate from the landfill. Y\_\_\_\_\_N\_\_\_\_\_

a) For cell 1, has FMC assured all of the following: YES NO

i) That the leachate collection system is maintained, inspected, and operated to maintain a leachate head on the liner of 12 inches or less. ☒ \_\_\_\_\_

4

2/18/92

Date: \_\_\_\_\_

YES NO

ii) That the flow volume is continuously recorded. ☒ \_\_\_\_\_

b) For cell 2, has FMC assured all of the following:

i) That leachate collection system for the cell possess a hydraulic conductivity of  $1 \times 10^{-10}$  to

Certification Document  
Will Be Provided to MDNR  
2/18/92



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

power -2 cm/sec and a transmissivity of at least  $3 \times 10^{-1}$  cm squared per second and are composed of that drainage media specified in attachment 9 or other media approved by the director.

- |                                     |   |                                     |  |
|-------------------------------------|---|-------------------------------------|--|
| <input checked="" type="checkbox"/> | (i) That the leachate collection system include a system for collecting and draining leachate from the side walls of each cell.   | —                                   |  |
| <input checked="" type="checkbox"/> | (iii) That leachate system is maintained, inspected, and operated to maintain a leachate head on the primary liner of 12 inches or less.  | —                                   |  |
| <input checked="" type="checkbox"/> | (iv) That the leachate collection sumps have a volume not less than 4000 liters and are accessible for removal of leachate and as necessary for maintenance of the leachate removal system. The sumps shall be constructed of material compatible with the leachate formed in the landfill. | —                                   |  |
| <input checked="" type="checkbox"/> | (v) The daily cover and waste placement in the cell are done in such a manner that the flow of leachate in the collection system to the sump is not prevented.  | —                                   |  |
| <input checked="" type="checkbox"/> | (vi) That flow volume removal are continuously recorded.  | <input checked="" type="checkbox"/> |  |
| <input checked="" type="checkbox"/> | (c) For cell 2, are leachate removal and collection constructed according to attachment 7 and the specification contained in attachment 9.  | —                                   |  |
| <input checked="" type="checkbox"/> | 6. Has FMC design, constructed and operated a leak detection, collection and removal system beneath the primary liner of all cells.   | <input checked="" type="checkbox"/> |  |

*cont.*

*NA*

*cont.*

-Is the system capable of detecting and removing any migrating liquid through the cells, including sidewalls and including the volume and quantity of such liquids.

5

2/18/92

Date: \_\_\_\_\_

YES      NO

-Does the drainage media of the leak detection, collection and removal system meet those specification outlined in attachment 9 of this license or other specification approved by the Chief of WMD.

—      —      *Self*

1. FILL IN\*\*\*\*\*



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

Run-on, Runoff, And Contaminant Control.

- Did the licensee -

- ☒ Construct, operate and maintain a run-on control system capable of preventing flow to the active portion of the facility during peak discharge from at least a 24 hour, 25 year storm.

Y \_\_\_\_\_ N \_\_\_\_\_ NA

- Divert runoff from non-active portions of the site to drainage ditches as specified on the engineering plans (Attach. 7)

Y ☒ N \_\_\_\_\_

- Collect and control the water volume resulting from active section of the facility from at least a 24 hour, 100 year storm. Note: This runoff shall be discharged in accordance with the Federal Clean Water Act and 1929 PA 245.

Y \_\_\_\_\_ N \_\_\_\_\_ NA

Does the licensee require:

- That all waste delivery truck traffic within the active cell be on a pavement or clean daily-cover to ensure that the contaminant are not carried out of the cell to the haul road.

Y \_\_\_\_\_ N \_\_\_\_\_ NA

- Does the licensee operate and maintain a vehicle wash facility?

Y ☒ N \_\_\_\_\_

- If yes...

Does the licensee ensure that vehicles traveling on active portion of the site are cleaned and decontaminated at the facility before leaving the activity area.

Y \_\_\_\_\_ N \_\_\_\_\_ NA

6

2/18/92

Date: \_\_\_\_\_

Waste Placement

☒ Does the licensee:

- Only place waste in the portion of cell 2 for which certification has been approved by a registered professional engineer.

Y \_\_\_\_\_ N \_\_\_\_\_ NA



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

☒ - Assure that the containers are at least 90% full when placed in a landfill, or crushed, shredded or simply reduced in volume to the maximum practical extent before burial in a landfill. If crushed in a landfill site, containers shall be crushed only in a landfill cell which is fully certified by a registered professional engineer.

Y \_\_\_\_\_ N \_\_\_\_\_ NA

☒ - Record the contents, quantity, and location of each daily waste deposit in the operating log. NOTE: This information shall be recorded on a map or diagram of each cell of disposal area and shall include cross reference to specific manifest document numbers.

Y \_\_\_\_\_ N \_\_\_\_\_ NA

**F. Environment And Human Health Standards**

Does FMC operate the facility in a manner that will prevent all of the following:

☒ Danger to human health, welfare or the environment.

Y ☒ N \_\_\_\_\_

☒ Violation of the Federal Clean Water Act as amended and Michigan Water Resource Commission Act.

Y ☒ N \_\_\_\_\_

☒ Air emission in violation of Federal Clean Air Act, as amended, the Michigan Air Pollution Act.

Y ☒ N \_\_\_\_\_

☒ Exposure of humans or the environment to harmful quantity of hazardous waste or hazardous waste constituents.

Y ☒ N \_\_\_\_\_

☒ Pollution, impairment or destruction of the natural resources of the state.

7

2/18/92

Date: \_\_\_\_\_

☒ Does the licensee place at least 15 cms of clean soil or other material approved by the Chief of Waste Management Division over the waste at the end of each working day.

Y \_\_\_\_\_ N \_\_\_\_\_ - NA

Does FMC effectively:

☒ Control Fugitive dust emission, in the manner approved by



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

the Chief of Waste Management Division.

Y\_\_\_\_\_N\_\_\_\_\_ NA

X Control all paved roads and make sure they are cleaned at least once during the days operation by a mechanical vacuum sweeper or other means approved by the Chief of Waste Management Division.

Y\_\_\_\_\_N\_\_\_\_\_ X

- Does FMC operate the vehicle wash facility at the landfill in such a way that aerosol sprays and other atmospheric emissions generated therefor do not result in a violation of the 1965 P.A. 348 as amended.

Y\_\_\_\_\_N\_\_\_\_\_

- Does FMC operate all vehicles in a manner which minimizes the contamination of on-site haul roads.

Y\_\_\_\_\_N\_\_\_\_\_ NA

- How does the facility handle the sludge from the wheel wash sump?

Recycle/Reclaim

Note: The sludge should be handled as listed hazardous waste for those waste types accepted at the facility. -- Generator requirements.

X Does FMC maintain an inspection log for all vehicles leaving the facility for the past six months.

Y\_\_\_\_\_N\_\_\_\_\_ NA

X Do these records indicate that there is any visible waste in the cargo section of any vehicle leaving the facility.

Y\_\_\_\_\_N\_\_\_\_\_ NA

8

2/18/92

Date: \_\_\_\_\_

Note: If there is waste in the cargo the facility should take all steps necessary to assure that all waste is removed from the vehicle prior to leaving the facility.

G. Partial Closure

YES NO

1. Close the landfill in accordance with plan 13/ of attach-



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

7,5, & schedule. and specification of attachment 9. \_\_\_\_\_ NA

☒ A. Is there an established shallow rooted grasses or is there a plan to start one in the earliest possible time to maintain the vegetation so as to stabilize the cap and prevent erosion \_\_\_\_\_ NA

☒ B. Has FMC submitted, to the director, a detailed partial closure plan consistent with the license for each portion of Cell 2 at least 180 days before the expected date of partial closure. \_\_\_\_\_ NA

What is the expected date of closure \_\_\_\_\_

H. Final Closure

1. FMC shall complete final closure in accordance with the schedule, engineering plans, and specifications of attachments 5,7, & 9. NA

☒ FEDERAL PERMIT CONDITIONS

Are waste minimization certifications maintained as part of the operating log? (264.73(b)(9) (I. Standard Condition G.5.)

Yes \_\_\_\_\_ No \_\_\_\_\_ NA

Facility NOT IN operation yet

Does the permittee certify at least annually that they have a program in-place to reduce the volume and toxicity of hazardous waste generated as specified in I. Standard Condition H.

Yes \_\_\_\_\_ No \_\_\_\_\_ NA

Date: \_\_\_\_\_

Does the Permittee comply with all the applicable land disposal prohibitions of 40 CFR 268? (II. Land Disposal Restrictions)

Yes \_\_\_\_\_ No \_\_\_\_\_ N/A



PERMIT CHECKLIST  
FORD ALLEN PARK CLAY MINE

Discuss corrective action status with the appropriate US EPA Permit Engineer assigned to the facility. (Rich Traub, US EPA Permit Unit Supervisor (312) 886-6136. He is the contact for determining appropriate Engineer assigned.)

USEPA Permit Engineer: \_\_\_\_\_

Status Update from USEPA: \_\_\_\_\_

Inspection results: \_\_\_\_\_



PERMITTED TREATMENT/STORAGE/DISPOSAL FACILITY  
INSPECTION FORM

Facility's Name East Moberly Co. Above Park Hwy Moberly  
Date 9/25 I.D. # MD980568 711

INSPECTION FORM D  
Part 6 Rules  
P.A. 64 of 1979

is facility, in addition being a treatment, storage &/or disposal facility:  
☐ Generates Hazardous Waste (also use Form D1)  
☐ Transports Hazardous Waste (also use Form C)

is facility:  
☐ Accepts waste from off-site sources  
☐ Handles only its own waste

applicable, hazardous waste is stored in:

<input type="checkbox"/> Container(s) (drums, totes, roll-off boxes, etc)	Number of units
<input type="checkbox"/> Tank(s) (also use Form D2)	_____
<input type="checkbox"/> Waste pile(s) (also use Form D4)	_____
<input type="checkbox"/> Surface Impoundment(s) (also use Form D3)	_____
<input type="checkbox"/> Miscellaneous Unit(s) (also use Form D8)	_____

applicable, hazardous wastes are treated in:

<input type="checkbox"/> Surface Impoundment(s) (also use Form D3)	_____
<input type="checkbox"/> Waste pile(s) (also use Form D4)	_____
<input type="checkbox"/> Land treatment (also use Form D5)	_____
<input type="checkbox"/> Incinerator (also use Form D7)	_____
<input type="checkbox"/> Aboveground tank(s) (also use Form D2)	_____
<input type="checkbox"/> Underground tank(s) (also use Form D2)	_____
<input type="checkbox"/> Container(s)	_____
<input type="checkbox"/> Miscellaneous Unit(s) (also use Form D8)	_____

applicable, hazardous waste are disposed in:

<input type="checkbox"/> Surface Impoundment(s) (also use Form D3)	_____
<input type="checkbox"/> Land treatment (also use Form D5)	_____
<input checked="" type="checkbox"/> Landfill (also use Form D6)	<u>1</u>
<input type="checkbox"/> Incinerator (also use Form D7)	_____
<input type="checkbox"/> Miscellaneous Unit(s) (also use Form D8)	_____

**WASTE STREAM(S)**

<u>HAZARDOUS WASTE #</u> <u>CODE/NAME</u>	<u>SOURCE</u>	<u>TYPE OF</u> <u>STORAGE</u>	<u>HOW MUCH/</u> <u>TIME PERIOD</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____



Treatment/Storage/Disposal Facility  
Form D

HAZARDOUS WASTE # CODE/NAME	SOURCE	TYPE OF STORAGE	HOW MUCH/ TIME PERIOD

AND BAN WASTE

YES



NO

Comments:

- Liner is complete
- Not in operation until Summer-Fall
- Background Leachate Sampling in progress
- INSPECTION, Training, CONTINGENCY PLAN, Closure Cost



Violation  
Class Yes No N/A

ENVIRONMENTAL AND HUMAN HEALTH STANDARDS GENERALLY (Rule 602)

1. Is the TSDF operated in a manner that will prevent the following:

*N/A*

- |  |       |     |   |                                     |
|--|-------|-----|---|-------------------------------------|
| a) Violations of Federal Clean Water Act or Act 245. (Rule 602(1)(a))  | (N/A) | [ ] | — | <input checked="" type="checkbox"/> |
| b) Air emissions in violation of the Federal Clean Air Act or Act 348. (Rule 602(1)(b))                          | (N/A) | [ ] | — | —                                   |
| c) Degradation, as defined in act 245, of a sole-source aquifer. (Rule 602(1)(c))                                | (N/A) | [ ] | — | —                                   |
| d) Exposure of humans or the environment to harmful quantities of hazardous waste/constituents. (Rule 602(1)(d)) | (N/A) | [ ] | — | —                                   |
| e) Pollution, impairment or destruction of natural resources of the state. (Rule 602(1)(e))                      | (N/A) | [ ] | — | —                                   |

FACILITY DESIGN AND OPERATING STANDARDS (Rule 604)

2. If applicable, are the following maintained at the TSDF:

- |  |       |                                     |   |   |
|--|-------|-------------------------------------|---|---|
| a) A run-on control system for a 24-hour, 25-year storm. (Rule 604(1)(a))          | (N/A) | <input checked="" type="checkbox"/> | — | — |
| b) A run-off management system for a 24-hour, 100-year storm. (Rule 604(1)(b))     | (N/A) | <input checked="" type="checkbox"/> | — | — |
| c) Systems to prevent hazardous waste/constituents from escaping. (Rule 604(1)(c)) | (N/A) | <input checked="" type="checkbox"/> | — | — |

Rule 605 refers to 40 CFR 264, Subpart B, 264.10-264.18

GENERAL FACILITY STANDARDS (264.11 & 264.12)

- |  |      |                                     |   |                                     |
|--|------|-------------------------------------|---|-------------------------------------|
| 3. Does the facility have an EPA id #. (264.11)  | (I)  | <input checked="" type="checkbox"/> | — | —                                   |
| 4. If required, have the following been notified:  |      |                                     |   |                                     |
| a) Director of receipt of hazardous waste from a foreign source. (264.12(a))   | (II) | [ ]                                 | — | <input checked="" type="checkbox"/> |
| b) The generator that the TSDF has permit(s) for and will accept the generators waste (copy of letters in operating record). (264.12(b)) | (II) | [ ]                                 | — | <input checked="" type="checkbox"/> |



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
c) Director on change in owner/operator. (264.12(c))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

GENERAL WASTE ANALYSIS (264.13)

5. Has the owner/operator obtained a detailed chemical and physical analysis of the waste. (264.13(a)(1))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. If necessary, has analysis been repeated to ensure it accurate. (264.13(a)(3))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. If necessary, is waste received from off-site inspected/analyzed to determine if it matches the manifest. (264.13(a)(4))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Does the owner/operator have a detailed waste analysis plan on file at the facility,	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the plan include:				
a) The parameters to analyze waste. (264.13(b)(1))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Test and sampling methods. (264.13(b)(2&3))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Frequency initial analysis will be reviewed or repeated. (264.13(b)(4))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Off-site waste analysis from generator and any additional analysis required. (264.13(b)(5&6))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For surface impoundments, exempt from land disposal restrictions under 268.4(a), the following schedule and procedures:				
i) Sampling of impoundments. (264.13(b)(7)(i))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Analysis of test data and annual removal of residues. (264.13(b)(7)(ii&iii)(A)(B)(1-2))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Does the waste analysis plan specify procedures for inspection and analysis of each off-site waste to ensure that it matches the manifest. (264.13(c))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Check Permit



Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
--------------------	-----	----	-----

SECURITY (264.14)

10. Is unknowing entry prevented into active portion (unless demonstrated to Director the physical contact and disturbance will not cause a violation), by:

- |   |     |                                     |   |                                     |
|---|-----|-------------------------------------|---|-------------------------------------|
| a) 24-hour surveillance. (264.14(b)(1))                                     | (I) | <input type="checkbox"/>            | — | <input checked="" type="checkbox"/> |
| OR  |     |                                     |   |                                     |
| b) Artificial or natural barrier and controlled entry. (264.14(b)(2)(i&ii)) | (I) | <input checked="" type="checkbox"/> | — | —                                   |
| c) Danger sign(s) at entrance. (264.14(c))                                  | (I) | <input checked="" type="checkbox"/> | — | —                                   |

GENERAL INSPECTION REQUIREMENTS (264.15)

- |  |      |                                     |   |   |
|--|------|-------------------------------------|---|---|
| * 11. Does the owner/operator inspect the facility for malfunctions, deterioration, operator errors and discharges of hazardous waste that may effect human health or the environment. (264.15(a)) | (II) | <input checked="" type="checkbox"/> | — | — |
| 12. Does the owner/operator have a written inspection schedule kept at the facility with the following: (264.15(b)(1&2))   |      |                                     |   |   |
| a) Monitoring equipment. (264.15(b)(1))  | (II) | <input checked="" type="checkbox"/> | — | — |
| b) Safety & emergency equipment. (264.15(b)(1))  | (II) | <input checked="" type="checkbox"/> | — | — |
| c) Security devices. (264.15(b)(1))  | (II) | <input checked="" type="checkbox"/> | — | — |
| d) Operating and structural equipment (i.e.: dikes, pumps, etc.) 264.15(b)(1))   | (II) | <input checked="" type="checkbox"/> | — | — |
| e) Types of problems to be looked for (i.e.: leaky fittings, eroding dike, etc.) (264.15(b)(3))  | (II) | <input checked="" type="checkbox"/> | — | — |
| f) Inspection frequency based on: (264.15(b)(4))   | (II) | <input checked="" type="checkbox"/> | — | — |
| i) Possible deterioration rate of equipment.   | (II) | <input checked="" type="checkbox"/> | — | — |
| ii) Areas subject to spills daily.   | (II) | <input checked="" type="checkbox"/> | — | — |
| 13. Does the owner/operator keep a record of inspections in an inspection log at the facility that contains the following: (264.15(b)(2) & (d))  |      |                                     |   |   |
| i) Date and time of inspection.  | (II) | <input checked="" type="checkbox"/> | — | — |



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
ii) Name of the inspector.	(II)	<input checked="" type="checkbox"/>	—	—
iii) Notation of observations made.	(II)	<input checked="" type="checkbox"/>	—	—
iv) Date and nature of repairs or other remedial actions.	(II)	<input checked="" type="checkbox"/>	—	—

- ☒ 14. Were malfunctions/deterioration of equipment or structures remedied on a schedule which ensures that the problem does not lead to an environmental or human health hazard. And where a hazard is imminent or already occurred remedial action is taken immediately. (264.15(c))

(I) ☒ — —

Comments:

Liquid in Discharge Line  
CONTAINMENT SYSTEM Sampled During  
Analysis

PERSONNEL TRAINING (264.16)

15. Do personnel training records contain the following:

a) Job title? (264.16(d)(1))	(II)	<input checked="" type="checkbox"/>	—	—
b) Job descriptions? (264.16(d)(2))	(II)	<input checked="" type="checkbox"/>	—	—
c) Name of employee filling jobs? (264.16(d)(1))	(II)	<input checked="" type="checkbox"/>	—	—
d) Description of type & amount of both introductory and continued training? (264.16(d)(3))	(II)	<input checked="" type="checkbox"/>	—	—
e) Is training designed to ensure that facility personnel are able to respond effectively to emergencies? (264.16(a)(3))	(I)	<input checked="" type="checkbox"/>	—	—
d) Records of training? (264.16(d)(4))	(II)	<input checked="" type="checkbox"/>	—	—
e) Do new personnel receive required training within 6 months? (264.16(b))	(I)	<input checked="" type="checkbox"/>	—	—
<input checked="" type="checkbox"/> f) Do personnel training records indicate that personnel have taken part in an annual review of initial training? (264.16(c))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>

Comments:



Treatment/Storage/Disposal Facility  
Fc D

Violation Class	Yes	No	N/A
--------------------	-----	----	-----

GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTE (264.17)

16. If required, are the following taken:

- |   |     |                          |   |                                     |
|---|-----|--------------------------|---|-------------------------------------|
| a) Ignitable/reactive waste separated and protected from ignition sources with 'No smoking' signs. (264.17(a))  | (I) | <input type="checkbox"/> | — | <input checked="" type="checkbox"/> |
| b) Precautions to prevent reactions which generate extreme heat, fire, gases, damage the facility, or other like means that threatens human health & environment. (264.17(b)) | (I) | <input type="checkbox"/> | — | <input checked="" type="checkbox"/> |
| c) Are actions taken in b, documented. (264.17(c))  | (I) | <input type="checkbox"/> | — | <input checked="" type="checkbox"/> |

Rule 606 refers to 40 CFR, Subpart C, 264.30-264.37

PREPAREDNESS AND PREVENTION (264.30)

- |  |     |                                     |   |                                     |
|--|-----|-------------------------------------|---|-------------------------------------|
| 17. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of hazardous waste or hazardous waste constituent? (264.31) | (I) | <input checked="" type="checkbox"/> | — | —                                   |
| 18. If required, does this facility have the following equipment:  |     |                                     |   |                                     |
| a) Internal communications or alarm systems? (264.32(a))   | (I) | <input type="checkbox"/>            | — | <input checked="" type="checkbox"/> |
| b) Telephone or 2-way radios at the scene of operations? (264.32(b))   | (I) | <input type="checkbox"/>            | — | <input checked="" type="checkbox"/> |
| c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (264.32(c))   | (I) | <input checked="" type="checkbox"/> | — | —                                   |
| d) Adequate volume of water and/or foam available for fire control? (264.32(d))  | (I) | <input checked="" type="checkbox"/> | — | —                                   |
| 19. Testing and Maintenance of Emergency Equipment:  |     |                                     |   |                                     |
| a) Does the owner or operator test and maintain emergency equipment to assure proper operation? (264.33)   | (I) | <input checked="" type="checkbox"/> | — | —                                   |

Comments: \_\_\_\_\_



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
b) Has owner/operator provided immediate access to internal alarms? (264.34(a&b))				
i) When hazardous waste is being poured, mixed, etc.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) One employee on the premises while facility is operating.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment? (264.35)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Rule 607 refers to 40 CFR 264, Subpart D, 264.50-264.56

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (264.50)

20. Does the contingency plan contain the following information:

a) The actions facility personnel must take in response to fires, explosions, or any unplanned release of hazardous waste? (See any PIPP or SPCC plan that can be added to.) (264.52(a)&(b))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Describe arrangements or attempts to make arrangements agreed to by local police and fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, pursuant to (264.52(c)) & (264.37)(a))?	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If local or state authorities decline to enter into such arrangements is the refusal documented. (264.37(b))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> c) Names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator? (264.52)(d))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

12/2/92



Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
-----------------	-----	----	-----

d) A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities? (264.52(e))

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

e) An evacuation plan for facility personnel if evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) (264.52(f))

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

21. Emergency Coordinator and Emergency Procedures:

a) Is coordinator familiar with all aspects of site operation and emergency procedures? (264.55)

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

b) Does the emergency coordinator have the authority to carry out the contingency plan? (264.55)

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

☒ c) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures? (264.56)

(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
-----	--------------------------	---	-------------------------------------

☒ 22. Plan Amendments and Copies:

a) Has the contingency plan been amended to reflect changes in regulations, plan factor changes in the facility, list of emergency coordinators, changes in emergency equipment? (264.54)

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

b) Are copies of the contingency plan available on site and local emergency organizations? (264.53)

(II)	<input checked="" type="checkbox"/>	—	—
------	-------------------------------------	---	---

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_



Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
-----------------	-----	----	-----

USE OF MANIFESTS (Rule 608: 40 CFR 264.71 & 264.72)

23. If the facility receives hazardous waste accompanied by a manifest, does the facility:

- |  |         |   |                                     |
|--|---------|---|-------------------------------------|
| a) Sign & date each copy.<br>(608(1)(a): 264.71(a)(1))   | (I) [ ] | — | <input checked="" type="checkbox"/> |
| b) Note any significant discrepancies.<br>(608(1)(b): 264.71(a)(2))  | (I) [ ] | — | <input checked="" type="checkbox"/> |
| c) Give the transporter 1 signed copy of the manifest. (608(1)(c): 264.71(a)(3))   | (I) [ ] | — | <input checked="" type="checkbox"/> |
| d) Copy sent to generator w/in 30 days and MDNR w/in 10 days after the end of the month in which the waste was received. (608(1)(d&f): 264.71(a)(4)) | (I) [ ] | — | <input checked="" type="checkbox"/> |
| e) Retain copy on-site. (608(1)(e): 264.71(a)(5))  | (I) [ ] | — | <input checked="" type="checkbox"/> |

24. If applicable, comply with requirement for bulk shipments of hazardous waste by rail or water transporter. (608(2): 264.71(b))

(I) [ ] — ☒

25. Notify the Director if a significant discrepancy is not corrected with the generator within 15 days. (608(4): 264.72))

(I) [ ] — ☒

RECORDKEEPING (Rule 609: 40 CFR 264.73 & 264.74)

26. Does the owner/operator maintain an operating record on-site with the following information recorded.

*NA*

- |  |          |   |                                     |
|--|----------|---|-------------------------------------|
| a) Description and quantity of hazardous waste received and method(s)/ date of its treatment, storage or disposal. (609(1)(a): 264.73(b)(1))     | (II) [ ] | — | <input checked="" type="checkbox"/> |
| b) Location & quantity of each hazardous waste within the facility (cross-referenced to specific manifest #) on a map. (609(1)(b): 264.73(b)(2)) | (II) [ ] | — | <input checked="" type="checkbox"/> |
| c) Records and results of all waste analysis, trial tests, monitoring data, and operator inspections. (609(1)(c): 264.73(b)(3))                  | (II) [ ] | — | <input checked="" type="checkbox"/> |
| d) Reports detailing all incidents that required implementation of the Contingency Plan. (609(1)(d): 264.73(b)(4))                               | (II) [ ] | — | <input checked="" type="checkbox"/> |



Treatment/Storage/Disposal Facility  
Form D

		Violation Class	Yes	No	N/A
e)	Records & results of inspections in 264.15 (question 11). (609(1)(e): 264.73(b)(5))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f)	If required, monitoring, testing or analytical when required by construction permit or operating license. (609(1)(f): 264.73(b)(6))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g)	Notices to generator (question 4) and records of rejected loads. (609(1)(g&h): 264.73(b)(7))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h)	Closure and post-closure cost estimates. (609(1)(j): 264.73(b)(8))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i)	Annual certification by permittee that a program is in place to reduce the volume and toxicity of hazardous waste he generates and activities on-site use methods to minimize threat to human health and environment. (264.73(b)(9)).	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j)	If applicable, quantity and date of placement of in a land disposal unit of waste with an extension to the land disposal restriction. (609(1)(k): 264.73(b)(10))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k)	For off-site treatment, a copy of notice or certification/demonstration from the generator. (609(1)(l): 264.73(b)(11))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l)	For on-site treatment, information contained in a notice (except manifest #) or certification/demonstration. (609(1)(m): 264.73(b)(12))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
m)	For off-site land disposal, a copy of notice or certification/demonstration from the generator. (609(1)(n): 264.73(b)(13))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n)	For on-site land disposal, information contained in a notice (except manifest #) or certification/demonstration. (609(1)(o): 264.73(b)(14))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o)	For off-site storage, a copy of notice or certification/demonstration from the generator. (264.73(b)(15))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
p)	For on-site storage, information contained in a notice (except manifest #) or certification/demonstration. (264.73(b)(16))	(II)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
q)	Any other records required to be kept by the operating license. (609(1)(p))	(N/A)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
27. Are all required records maintained and available for inspection. (609(2&3): 264.74(a))	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments: _____				

REPORTING (Rule 610: 40 CFR 264.75 - 264.76)

28. Has the owner/operator submitted a biennial report to the Regional Administrator by March 1 of even numbered years. (610: 264.75)	(II)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
29. If hazardous waste is received from off-site has: (610(2): 264.76)				
a) The facility accepted any waste without a manifest or shipping paper.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) If 'a' is yes, was the Director provided with a report within 15 days.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
30. Has the owner/operator of a hazardous waste disposal/treatment on the site of generation submitted a monthly report to the Director. (610(3))	(N/A)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL MONITORING (Rule 611)

31. If applicable, has the TSDF carried out their environmental monitoring program.	(N/A)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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RELEASES FROM SOLID WASTE MANAGEMENT UNITS (264 Subpart F)

32. Did owner/operators comply with 264.101 for all solid waste management units.	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Did facilities with surface impoundments, waste piles and land treatment units receiving waste after 7-26-82 comply with 264.91 thru 264.100 in lieu of 264.101 for releases to the upper-most aquifer (see exceptions). (264.90(a)(2)&(b))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
33. Did the owner/operator subject to this subpart conduct a monitoring/response program. (264.91)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
34. Did the owner/operator comply with specifics in the permit (EPA-HSWA permit). (264.92 - 264.101)	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

See permit checklist



Treatment/Storage/Disposal Facility  
Form D

Violation Class	Yes	No	N/A
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CLOSURE AND POST-CLOSURE (Rule 613: 40 CFR Subpart G)

35. Does the facility have a written closure plan. If applicable, do certain surface impoundment and waste piles have contingent closure plans. Does the plan identify: (613(1): 264.112(a&b)) (I) ☒ — —
- a) Description of how each hazardous waste unit will be closed. (264.112(b)(1)) (I) ☒ — —
- b) Maximum extent unclosed during the facility life with description of final closure. (264.112(b)(2)) (I) ☐ — ☒
- c) Maximum inventory of waste. (264.112(b)(3)) (I) ☐ — ☒
- d) Description of steps to remove or decontaminate equipment, soils, etc. (264.112(b)(4)) (I) ☒ — —
- e) Description of other closure activities to satisfy closure performance standards. (264.112(b)(5)) (I) ☒ — —
- ☒ f) Schedule of closure activities. (264.112(b)(6)) (I) ☒ — —
- ☒ 36. Is a written closure cost estimate available and was cost adjusted for inflation. (264.142(a&b)) (I) ☒ — —

Note: Disposal facilities need post-closure

37. Does the facility have a written post-closure plan. If applicable do certain surface impoundment and waste piles have contingent closure plans. Does the plan identify: (613(1): 264.118(a&b)) (I) ☒ — —
- a) Description of the planned monitoring activities (i.e.: waste piles, etc.). (264.118(b)(1)) (I) ☒ — —
- b) Description of maintenance activities and the frequencies for: (264.118(b)(2))
- i) Integrity of cap/final cover or other containment systems. (264.118(b)(2)(i)) (I) ☒ — —
- ii) Monitoring equipment. (264.118(b)(2)(ii)) (I) ☒ — —
- c) Name, address and phone number of person or office to contact during post-closure care period. (264.118(b)(3)) (I) ☒ — —



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes No N/A		
		Yes	No	N/A
38. <input checked="" type="checkbox"/> Is a written post-closure cost estimate available and was cost adjusted for inflation. (264.142(a&b)) (I)	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
39. <input checked="" type="checkbox"/> If changes to the approved closure or post-closure plan were made did the owner/operator first submit a written request to make said changes. (264.112(c)) (I)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Rule 614 refers to 40 CFR, Subpart I, 264.170-264.178

USE AND MANAGEMENT OF CONTAINERS IN STORAGE (Rule 614: 40 CFR 264 Subpart I)

40. Is each container labeled or marked clearly with the words "Hazardous Waste"? (614(1)(b)) If no, how many _____?	(N/A)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
41. Are containers in good condition? (264.171) If no, specifically what is their condition? _____	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
42. Are containers compatible with waste in them? (264.172) If no, explain _____	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
43. Are containers stored closed? (264.173(a)) If no, how many _____?	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
44. Are containers managed to prevent leaks? (264.173(b)) If no, explain _____	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
45. Are containers inspected weekly for leaks and defects? (264.174)	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
46. Container storage areas must have a containment system designed and operated as follows if the waste contains free liquids or is F020, F021, F022, F023, F026, F027:  a) Impervious base free of cracks? (264.175(b)(1))	(I)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Treatment/Storage/Disposal Facility  
Form D

	Violation Class	Yes	No	N/A
b) Sloped or otherwise designed to elevate or protect containers from contact with accumulated liquids? (264.175(b)(2))	(I) [ ]	___	___	<input checked="" type="checkbox"/>
c) Containment capable of holding 10% of volume of containers or 10% of largest container, whichever is greater? (264.175(b)(3))	(I) [ ]	___	___	<input checked="" type="checkbox"/>
d) Run-on prevented unless capacity in excess of question 46(c)? (264.175(b)(4))	(I) [ ]	___	___	<input checked="" type="checkbox"/>
e) Accumulated liquids (waste and/or precipitation) removed in a timely manner to prevent overflow? (264.175(b)(5))	(I) [ ]	___	___	<input checked="" type="checkbox"/>
47. If stored hazardous waste is solid (other than F020, F021, F022, F023, F026, F027) is the storage area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c))	(I) [ ]	___	___	<input checked="" type="checkbox"/>
48. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from property line? (Indicate if waste is ignitable or reactive.) (264.176) If no, explain _____.	(I) [ ]	___	___	<input checked="" type="checkbox"/>
49. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 264.17(b) apply.) (264.177(a)) If no, explain _____.	(I) [ ]	___	___	<input checked="" type="checkbox"/>
50. Are hazardous wastes placed in containers that previously held incompatible material. (264.177(b))	(I) [ ]	___	___	<input checked="" type="checkbox"/>
51. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? (264.177(c))	(I) [ ]	___	___	<input checked="" type="checkbox"/>

PRE-TRANSPORT REQUIREMENTS (Rule 305: 40 CFR 262.30)

52. Is waste packaged in accordance with DOT regulations (required prior to movement of hazardous waste off-site)? (Rule 305(1)(a): 40 CFR 262.30).	company rep said observed	___ ___	___ ___	<input checked="" type="checkbox"/>
5. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous materials (required prior to movement of hazardous waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.31 & 262.32(a))	company rep said observed	___ ___	___ ___	<input checked="" type="checkbox"/>



Treatment/Storage/Disposal Facility  
Form D

54. On containers of 110 gallons or less, does the appropriate information displayed include a warning and generator's name, address, manifest document number and waste code as required in 40 CFR 172.304?  
(Rule 305(1)(d): 40 CFR 262.32(b))

company rep said \_\_\_\_\_  
observed \_\_\_\_\_

( I )      [ \_ ]      \_\_\_\_\_      

55. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)

company rep said \_\_\_\_\_  
observed \_\_\_\_\_

(1) [ ] —

Comments: \_\_\_\_\_



PERMITTED LANDFILL INSPECTION FORM

Facility's Name Ford Allen Park City Waste  
 Date 3/25/99 I.D. # MD940568 711

INSPECTION FORM D6  
 Part 6 Rules  
 P.A. 64 of 1979

Rule 619 refers to 40 CFR, Part 264, Subpart N, 264.300-264.351

Violation			
Class	Yes	No	N/A

DESIGN AND OPERATING REQUIREMENTS (264.301)

1) Any landfill (except a new landfill, new unit, replacement, or lateral expansion at an existing landfill) must have:

a) A liner which is constructed and installed to prevent migration of waste. The liner must be:

i) Constructed of materials that have appropriate chemical properties, sufficient strength and thickness. (264.301(a)(1)(i))

(I) [ ] — X

ii) Placed on a foundation or base capable of providing support and resistance to pressure gradients. (264.301(a)(1)(ii))

(I) [ ] — X

iii) Installed to cover all surrounding earth likely to be in contact with waste or leachate. (264.301(a)(1)(iii))

(I) [ ] — X

b) A leachate collection and removal system immediately above the liner. (264.301(b))

(I) [ ] — X

OR

2) Received an exemption from the existing liner requirements from the Director. (264.301(b))

(I) [ ] — X

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



Landfill Inspection Form  
Form D6

	Violation Class	Yes	No	N/A
3) The owner/operator of a new landfill, new unit, replacement, or lateral expansion at an existing landfill must have:				
a) Met the requirements of R 299.9620(2). (Rule 619(2))	(N/A)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
b) Two or more liners. (264.301(c))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
c) Leachate collection system above and between liners. (264.301(c))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
OR				
d) Approval for alternate design from Director. (264.301(d & e))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
4) Operates and maintains a leak detection, collection and removal system between the liners as per R 299.9622. (Rule 619(3))	(N/A)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
5) The owner/operator must operate and maintain a run-on control system to stop flow onto active portion (minimum 25-year storm). (264.301(f))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
6) The owner/operator must operate and maintain a run-off system to collect and control water (minimum 25-year storm). (264.301(g))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
7) Were collection and holding units (ex: tanks) for run-on and run-off emptied or other wise managed right after a storm. (264.301(h))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
8) If landfill is subject to wind disposal is it covered or controlled to stop wind dispersal. (264.301(i))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_

MONITORING AND INSPECTIONS (264.303)

9) During installation were liners and cover systems inspected (ex: uniformity, damage, etc.) (264.303(a))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
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Landfill Inspection Form  
Form D6

	Violation Class	Yes	No	N/A
10) Immediately after construction or installation of liner(s) or cover system(s) were:				
a) Synthetic cover and liners inspected to ensure:				
i) Tight seams and joints. (264.303(a)(1))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
ii) Absence of tears, punctures or blisters. (264.303(a)(1))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
b) Soil-based and admixed liner and covers inspected for imperfections (ex: lenses, cracks, root holes, etc.) (264.303(a)(2))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
11) While a landfill is in operation, was it inspected weekly and after storms for:				
a) Deterioration, malfunction or improper operation of run-on and run-off control systems. (264.303(b)(1))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
b) Proper functioning of wind dispersal system. (264.303(b)(2))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
c) Presence of leachate in and proper functioning of leachate collection and removal system. (264.303(b)(3))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>

SURVEYING AND RECORDKEEPING (264.309)

12) Does the owner/operator maintain the following in the operating record:				
a) A map of each cell (location & dimension). (264.309(a))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>
b) Contents of cell and location of each waste type. (264.309(b))	(I)	<input type="checkbox"/>	—	<input checked="" type="checkbox"/>

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_



Landfill Inspection Form  
Form D6

Violation Class	Yes	No	N/A
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SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE (264.312)

13) Ignitable or reactive waste must not be placed in a landfill unless:

a) The waste is treated, etc. before or after placement in the landfill so:

i) The waste/mixture is no longer ignitable or reactive. (264.312(a)(1))

(I) [ ] —

2

ii) Taken precautions to prevent reactions which generate extreme heat, fire, gases, damage the facility, or other like means that threatens human health & environment. (264.312(a)(2) refers to 264.17(b))

(I) [ ] —

2

EXCEPT

b) Ignitable waste in containers is protected for conditions/material which may cause it to ignite or react can be landfilled. (264.312(b))

(I) [ ] —

2

SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES (264.313)

14) Incompatible wastes must not be placed in the same landfill cell unless 264.17(b) is complied with. (264.313)

(I) [ ] —

2

DISPOSAL OF SMALL CONTAINERS OF HAZARDOUS WASTE  
IN OVERPACKED DRUMS (LAB PACKS) (264.316)

15) Small containers in overpack drums may be landfilled if:

a) Containers are:

i) Non-leaking. (264.316(a))

(I) [ ] —

2

ii) Won't react, ignite or dangerously decompose with other container waste. (264.316(a))

(I) [ ] —

2

iii) Container uses meets DOT and is sealed. (264.316(a))

(I) [ ] —

2



Landfill Inspection Form  
Form D6

	Violation Class	Yes	No	N/A
b) Overpack is:				
i) Meets DOT. (264.316(b))	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Maximum 110 gallons. (264.316(b))	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Sufficient absorbent used that will not react, ignite or dangerously decompose with waste. (264.316(b&c))	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
16) Were incompatible wastes placed in same container. (264.316(d))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17) Were reactive wastes (other than cyanide or sulfide bearing) treated. (264.316(e))	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

SPECIAL REQUIREMENTS FOR HAZARDOUS WASTES F020, F021, F022, F023, F026 AND F027. (264.317)

18) Were F020, F021, F022, F023, F026 and F027 placed in a landfill without an approved plan from the Director. (264.317(a))	(I)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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CLOSURE AND POST-CLOSURE CARE (264.310)

19) Did the owner/operator close the landfill in compliance with 264.310 and R 299.619(5).	(I)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
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Comments: ALL ASPECTS COVERED BY PERMIT CHECKLIST



## RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

## I. General Information

Facility: Ford Allen Park Clay Mine  
 U.S. EPA ID No.: MD 940568 711  
 Street: Oakwood + Southfield  
 City: Allen Park State: MI Zip: 48120  
 Telephone: 313-390-3209

Inspection Date: 11 Time: \_\_\_\_\_ (am/pm)

Weather Conditions: \_\_\_\_\_

Inspectors: 

<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
<u>Kurt Childs</u>	<u>MDNR</u>	<u>313-953-0241</u>

Facility Representatives: Jeff Hartlund 313-322-0709

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	_____	_____	_____	_____	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List*	_____	_____	_____	_____	_____
First Third [40 CFR 268.10]	_____	_____	_____	_____	_____
Second Third [40 CFR 268.11]	_____	_____	_____	_____	_____
Third Third [40 CFR 268.12]	_____	_____	_____	_____	_____

\* See Appendix A



## INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Facility Not in operation yet

LDR Waste Management:

Summary:

Signature:



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## IV. TSD REQUIREMENTS

## A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?  
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
F020-F023 and F026-F028 Dioxins	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
California List Wastes	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
First, Second, and Third Third Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

Comments \_\_\_\_\_

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☒

3. What date was the waste analysis plan last revised?   /  /   ME

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☒ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

- ☐ Generator provides data  
☐ Facility performs analyses in on-site laboratory  
☐ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ☐ No ☐ NA ☒

If analyses are conducted off site, identify lab: \_\_\_\_\_

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?\* (BDAT\*\* = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☐ No ☐ NA ☒

\*See Appendix C for exceptions.

\*\*BDAT = best demonstrated available technology. See Appendix A.



If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

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- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?\* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐No ☐NA ☒

\*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

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- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ☐No ☐NA ☒

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

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☒ B.

Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☐No ☐

NA

2. Does the operating record contain copies of LDR notifications and certifications?\* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☐No ☐

\*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☐No ☐NA ☐



Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?\*

Yes \_\_\_ No \_\_\_ NA \_\_\_

\*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited\* wastes stored on site in containers?

Yes \_\_\_ No ☒ (If No, go to 2.)

\*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes \_\_\_ No \_\_\_

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes \_\_\_ No \_\_\_ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes \_\_\_ No \_\_\_

If yes, state how: \_\_\_\_\_

2. Are prohibited wastes stored on site in tanks?

Yes \_\_\_ No ☒ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes \_\_\_ No \_\_\_

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes \_\_\_ No \_\_\_ (If Yes, go to 3.)



Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes \_\_\_ No \_\_\_

If yes, state how: \_\_\_\_\_

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes \_\_\_ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes \_\_\_ No \_\_\_

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes \_\_\_ No \_\_\_

#### D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes \_\_\_ No ☒ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes \_\_\_ No \_\_\_ NA \_\_\_ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes \_\_\_ No \_\_\_

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes \_\_\_ No \_\_\_ NA \_\_\_



4. Describe all other waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?\*

Yes \_\_\_\_ No \_\_\_\_

\*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes \_\_\_\_ No \_\_\_\_

Comments \_\_\_\_\_

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes \_\_\_\_ No \_\_\_\_ (If No, go to c.)

List the wastes \_\_\_\_\_

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes \_\_\_\_ No \_\_\_\_

If yes, is this method used for the aggregated wastes?

Yes \_\_\_\_ No \_\_\_\_

Comments \_\_\_\_\_

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes \_\_\_\_ No \_\_\_\_

Comments \_\_\_\_\_



7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes \_\_\_ No \_\_\_ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes \_\_\_ No \_\_\_

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes \_\_\_ No \_\_\_ (If No, go to 10.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes \_\_\_ No \_\_\_

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes \_\_\_ No \_\_\_ (If No, go to E.)



Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes \_\_\_ No \_\_\_

**E. Surface Impoundments [40 CFR 268.4]**

1. Are restricted wastes placed in surface impoundments for treatment?

Yes \_\_\_ No ☒ (If No, go to F.)

List \_\_\_\_\_

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes \_\_\_ No \_\_\_

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes \_\_\_ No \_\_\_

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_



7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code \_\_\_\_\_  
 Supernatant Yes ☐ No ☐ Waste Code \_\_\_\_\_

Provide the frequency of analyses conducted on treatment residues:

\_\_\_\_\_

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments \_\_\_\_\_

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments \_\_\_\_\_

 F.

#### Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments\*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☒ No ☐ (If No, go to G.)

\*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments \_\_\_\_\_

Not operating yet



3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?\* [40 CFR 268.9(c)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

\*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes \_\_\_ No \_\_\_

If yes, at what frequency are analyses performed? \_\_\_\_\_

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes \_\_\_ No \_\_\_ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) \_\_\_\_\_

Case-By-Case Extension (40 CFR 268.5) \_\_\_\_\_

No-Migration Petition (40 CFR 268.6) \_\_\_\_\_

Treatment Standard Variance (40 CFR 268.44) \_\_\_\_\_

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes \_\_\_ No \_\_\_ NA \_\_\_

6. Are restricted wastes placed in underground injection wells?

Yes \_\_\_ No \_\_\_ List \_\_\_\_\_



## G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ☐ No ☒ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☐

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?\* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☐

\*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ☐ No ☐ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

_____	_____
_____	_____
_____	_____

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☐ No ☐ (If No, go to 4.)



If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes \_\_\_ No \_\_\_ NA \_\_\_

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes \_\_\_ No \_\_\_ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes \_\_\_ No \_\_\_ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes \_\_\_ No \_\_\_ NA \_\_\_ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes \_\_\_ No \_\_\_



5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes \_\_\_\_\_ No \_\_\_\_\_ (If No, go to 6.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>

- b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes \_\_\_\_\_ No \_\_\_\_\_

6. Dilution Prohibition [40 CFR 268.3]:

- a. Are prohibited\* wastes with different treatment standards mixed?

\*See Appendix E for distinction between restricted and prohibited wastes.

Yes \_\_\_\_\_ No \_\_\_\_\_ (If No, go to b.)

List the wastes \_\_\_\_\_

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments \_\_\_\_\_

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes \_\_\_\_\_ No \_\_\_\_\_ (If No, go to c.)

Check appropriate category:

- \_\_\_ Dilutes to meet treatment standards
- \_\_\_ Dilutes to render waste non-hazardous



Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act  
☐ Non-toxic\* characteristic wastes  
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

\*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

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- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☐

Comments 

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H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

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